FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1158

Date Filmed 1/7/83 Camera No. --- 2

Cameraman BPC

FEDERAL ELECTION COMMISSION

letters concerning conciliation, conciliation agreements, memos to Commission concerning conciliation discussions. conciliation material

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
✓	(3) Exempted by other statute	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
___	(5) Internal Documents		

Signed Lois G. Lerner

date 11/22/82

FEC 9-21-77

[redacted]ERAL ELECTION COMMISSION

Conciliation material

bank account numbers, routing slips, memos to file, acknowledgement of receipt of documents, threshold informat

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
✓	(2) Internal rules and practices	___	(7) Investigatory files
✓	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed ___

date ___

FEC 9-21-77

FEDERAL ELECTION COMMISSION

routing slips, memos to file

bank act numbers:

Commissioners - objection, non MUR material

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed L. Emmons

date 12/23/82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

FBI Handwriting analysis submission procedures and analysis, bank account numbers memos to file Commission objection sheet

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
✓	(2) Internal rules and practices (FBI)	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed L. S. Lerner

date 11/23/82

FEC 9-21-77

0037117

FEDERAL ELECTION COMMISSION

Memo from Audit to OGC - Internal Lack of Cash, memo to file Address of non-resp., routing slips

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed ___

date ___

FEC 9-21-77

3 7 0 2 7 1 - 7

FEDERAL ELECTION COMMISSION

bank records - transaction records - not used in the MUR

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
___	(5) Internal Documents		

Signed _____

date 11-23-82

FEC 9-21-77

3717

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of Citizens for LaRouche in settlement of the above-referenced matters. Accordingly, the files have been closed in MURs 1158, 1186, 1253, 1352 and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Citizens for LaRouche wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I also want to remind you that the first payment of $5,000 by Citizens for LaRouche for the civil penalty provided for in the agreement is due on December 1, 1982. The check should be made out to the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

On November , 1982, the Commission accepted the conciliation agreement signed by you on behalf of Citizens for LaRouche in settlement of the above-referenced matters. Accordingly, the files have been closed in MURs 1158, 1186, 1253, 1352 and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Citizens for LaRouche wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I also want to remind you that the first payment of $5,000 by Citizens for LaRouche for the civil penalty provided for in the agreement is due on December 1, 1982. The check should be made out to the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

11/5/82

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MURs 1158, 1186, 1253 and 1352
Citizens for LaRouche	)	
Debra Freeman	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 5, 1982, the Commission decided by a vote of 6-0 to take the following actions in MURS 1158, 1186, 1253 and 1352:

1. Accept the signed conciliation agreements of Citizens for LaRouche and Debra Freeman as submitted with the November 2, 1982, Memorandum to the Commission.

2. Close the files in MURs 1158, 1186, 1253 and 1352.

3. Send the letter to respondents' counsel as attached to the Memorandum to the Commission dated November 2, 1982.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

11-5-82
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 11-2-82, 4:31
Circulated on 48 hour tally basis: 11-3-82, 11:00

November 2, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: Conciliation in MURs 1158, 1186, 1253 and 1352

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Gentner (for Lerner)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1158

Dear Mr. Morganroth:

On November , 1982, the Commission accepted the conciliation agreement signed by you on behalf of respondent Debra Freeman in settlement of the above-referenced matter. Accordingly, the file has been closed and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Debra Freeman wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I remind you that the agreement does require that Ms. Freeman pay a civil penalty of $2,500 within thirty days. Payment should be made to the order of the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

11/5/82

BEFORE THE FEDERAL ELECTION COMMISSION

2001 27 P 1:59

In the Matter of Debra Hanania Freeman) MUR 1158

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

3704037119

1. Respondent was a volunteer agent for the Citizens for LaRouche Campaign Committee during the 1980 presidential primary campaign.

2. As such, Respondent solicited and collected campaign contributions in and around Baltimore, Maryland for the Citizens for LaRouche committee and forwarded them to LaRouche headquarters in New York.

3. Respondent was aware that the contributions which were forwarded to New York would be submitted by Citizens for LaRouche to the Federal Election Commission in an effort to obtain presidential primary matching funds.

4. On or about January 14, 1980 respondent withdrew $750 from her personal savings account at the Maryland National Bank and used part of that withdrawal to purchase cashier's check No. 3441224 in the amount of $250.

5. Cashier's check No. 3441224, along with a contribution acknowledgement document purportedly signed by Harold H. Harrison, M.D., was forwarded to the New York headquarters of Citizens for LaRouche and subsequently submitted to the Federal Election Commission for the purpose of receiving matching funds.

V. The above facts reveal that Respondent committed the following violations:

1. 2 U.S.C. § 441f by making a contribution to Citizens for LaRouche in the name of another, to wit, Harold H. Harrison, M.D.

2. 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully furnishing false information which misrepresented a material fact, to wit, Maryland National Bank cashier's check No. 3441224 in the amount of $250, to the Commission in an effort to obtain presidential primary matching funds for Citizens for LaRouche.

VI. The Commission has treated the matters described in this document as civil violations.

VII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two thousand five hundred dollars ($2,500) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that she shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action with regard to the matters set forth in this agreement or in MUR 1158 as it pertains to this respondent.

XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Nov. 5, 1982
Date

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Debra Hanania Freeman

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

2201271 3

2201271

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C 20463

November 8, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1158

Dear Mr. Morganroth:

On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of respondent Debra Freeman in settlement of the above-referenced matter. Accordingly, the file has been closed and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Debra Freeman wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I remind you that the agreement does require that Ms. Freeman pay a civil penalty of $2,500 within thirty days. Payment should be made to the order of the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

3710378

RECEIVED AT THE FEC

82 OCT 27 P12:25

82 OCT 27 P1:58

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for LaRouche) MURs 1158, 1186, 1253 and 1352
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f;

11 C.F.R. § 110.4(c)(2);

2 U.S.C. § 441a(f) and;

26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is the principal campaign committee authorized by Lyndon LaRouche to receive contributions and make expenditures in connection with Lyndon LaRouche's candidacy for the Democratic nomination for the office of President in 1980.

2. During that period, Respondent maintained offices throughout the country where volunteers, inter alia, solicited contributions and forwarded them to Respondent's New York headquarters.

3. These volunteers knew that Respondent would submit the collected contributions to the Commission in an effort to obtain presidential primary matching funds.

4. Respondent, through its volunteers, violated 2 U.S.C. § 441f by knowingly accepting the following contributions made by one person in the name of another:

(A) MUR 1158

(1) $250 cashier's check in the name of Harold Harrison dated 1/14/80.

(2) $150 money order in the name of Anne R. Taylor dated 11/20/79.

(3) $1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

(1) $250 money order signed "Robert Hart" and dated 12/10/79 (no accompanying signature document).

(2) $125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(3) $120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(4) $100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).

(5) $100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).

(6) $135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(7) $85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(8) $80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(9) $55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

5. Respondent, through its volunteers, violated 11 C.F.R. § 110.4(c)(2) by accepting and retaining the following cash contributions, which when added to the contributors' previous contributions, exceeded, in the aggregate, $100 in cash for each of the respective contributors:

(A) MUR 1158

(1) $40 cash contribution made by Ernest Pulsifer.

(2) $150 cash contribution made by Ernest Pulsifer.

(3) $250 cash contribution made by Nancy Radcliffe.

(4) $400 cash contribution made by Belinda F. deGrazia.

7 1 0 3 7 1 1 9

The Commission has not alleged that these were knowing and willful violations.

6. Respondent, through its volunteers, violated 2 U.S.C. § 441a(f) by knowingly accepting the following contributions which were in violation of contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(A):

(A) MUR 1158

(1) $1,009.58 check from David Sanders.

(B) MUR 1253

(1) $2,713.53 in contributions from Rochelle Ascher;

(2) $1,742.15 in contributions from Karen Brubaker;

(3) $1,024.48 in contributions from John Covici;

(4) $1,279.55 in cntributions from Joseph D'Urso;

(5) $3,378.34 in contributions from Elliot Eisenberg;

(6) $2,067.32 in contributions from Jeffrey Forrest;

(7) $1,409.59 in contributions from Gregory Garnier;

(8) $5,120.32 in contributions from Laurence Gray;

(9) $3,681.32 in contributions from Marjorie Mazel Hecht;

(10) $1,285.87 in contributions from Marsha Kokinda;

(11) $1,738.68 in contributions from Melvin Johnson;

(12) $1,763.76 in contributions from Michael Smedberg;

(13) $1,005.44 in contributions from Martin Simon;

(14) $1,507.65 in contributions from David W. Thill;

(15) $2,403.90 in contributions from Andrew Wilson;

(16) $1,025 in contributions from August F. Arace;

(17) $1,043 in contributions from James M. Duree;

(18) $1,105 in contributions from Shirley Fingerman;

(19) $1,030 in contributions from John Holly;

(20) $1,044 in contributions from T. J. Hopkins;

(21) $1,150 in contributions from Sherri S. Lightner;

(22) $1,100 in contributions from John Pellicano;

(23) $1,100 in contributions from John Ryman;

(24) $1,120 in contributions from John J. Sakala;

(25) $1,125 in contributions from Walter J. Stevens;

(26) $1,010 in contributions from James Taylor;

(27) $1,030 in contributions from Verne Tomlins;

(28) $1,515 in contributions from Carleton Williams;

(29) $1,580 in contributions from Frederic L. Young;

(30) $2,375 in contributions from Donald J. Carr;

(31) $2,030 in contributions from Ellen G. Scott;

(32) $1,050 in contributions from Belinda F. deGrazia;

(33) $1,250 in contributions from Alexander Ward;

(34) $1,125 in contributions from Mary F. Cummings;

(35) $1,075 in contributions from James M. Everette;

(36) $1,250 in contributions from Michael Micale.

The Commisson has not alleged that these were willful violations.

7. Respondent, through its volunteers, violated 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully submitting

13204371179

false and/or misleading information to the Commission in an attempt to obtain matching funds with regard to the following contributions:

(A) MUR 1158

(1) $35 money order signed "William Hayden" and dated 1/8/80.

(2) $150 money order signed "Ernest Pulsifor" and dated 12/4/79.

(3) $250 money order signed "Nancy Radcliff" and dated 9/12/79.

(4) $250 money order signed "Robert A. Robinson" and dated 9/12/79.

(5) $140 money order signed "Kevin Salisbury" and dated 1/12/80.

(6) $450 money order signed "Kevin Salisbury" and dated 1/21/80.

(7) $70 money order signed "Charles Clark" and dated 11/13/79.

(8) $150 money order signed "Anne R. Taylor" and dated 11/20/79.

(9) $45 money order signed "David Sanders" and dated 11/25/79.

(10) $25 money order signed "David Sanders" and dated 1/3/79.

(11) $1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.

(12) $400 money order signed "Belinda F. deGrazia" and dated 1/22/80.

(13) $250 cashier's check and signature document for Dr. Harold Harrison.

7 1 1 9

(B) MUR 1186

(1) $40 money order signed "Harold Harper" and dated 7/17/79 accompanied by signature document dated 12/7/79.

(C) MUR 1352

(1) $200 money order signed "William Lerch" and dated 11/19/79.

(2) $55 money order signed "William Lerch" and dated 12/7/79.

(3) $135 money order signed "Sherri Waffle" and dated 12/7/79.

(4) $85 money order signed "Sherri Waffle" and dated 12/7/79.

(5) $80 money order signed "Sherri Waffle" and dated 12/7/79.

(6) $125 money order signed "Janice Hart" and dated 12/7/79.

(7) $120 money order signed "Janice Hart" and dated 12/7/79.

(8) $100 money order signed "Victoria Lacey" and dated 12/10/79.

(9) $50 money order signed "Victoria Lacey" and dated 12/10/79.

(10) $250 money order signed "Robert Hart" and dated 12/10/79.

(11) $100 money order signed "Paul Greenberg" and dated 12/10/79.

(12) $100 money order signed "Paul Greenberg" and dated 12/11/79.

V. The Commission has treated the matters described in this document as civil violations.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of fifteen thousand dollars

7 4 0 3 7 1 9

($15,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1) One initial payment of $5,000, due on December 1, 1982;

2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of $1,000 each;

3) Each such installment shall be paid on the first day of the month in which it becomes due;

4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VII. Respondent agrees that it shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with

this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action by the Commission with regard to the matters set forth in this agreement. It is the understanding of the Respondent and the Commission that the execution of this agreement will result in the termination of all pending Matters Under Review concerning the respondent as of the present date, and that this agreement constitutes complete satisfaction of all such pending Matters Under Review.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

Charles N. Steele
General Counsel

Nov. 5, 1982
Date

By: Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 NOV 2 P4: 31

November 2, 1982

MEMORANDUM

TO: The Commission

SENSITIVE

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: Conciliation in MURs 1158, 1186, 1253, and 1352
Citizens for LaRouche

Attached are the conciliation agreements of respondents Citizens for LaRouche ("CFL") and Debra Freeman, respectively, in the above-referenced matters, which have been signed by counsel for the respondents. In signing the agreements, no changes were made by respondents' counsel to the documents and thus the signed agreements are identical in their entirety to those approved by the Commission on October 13, 1982. Accordingly, the Office of General Counsel recommends that the Commission accept the attached conciliation agreements and close the file in MURs 1158, 1186, 1253, and 1352.

RECOMMENDATIONS

1. Accept the attached signed conciliation agreements of Citizens for LaRouche and Debra Freeman

2. Close the files in MURs 1158, 1186, 1253, and 1352

3. Send the attached letter to respondents' counsel.

Attachments

I. Signed Conciliation agreement of Citizens for LaRouche

II. Signed Conciliation agreement of Debra Freeman

III. Letter to Mayer Morganroth, respondents' counsel

RECEIVED BY THE FEC

82 OCT 27 P12:25

BEFORE THE FEDERAL ELECTION COMMISSION

OCT 27 P1:58

In the Matter of)
Citizens for LaRouche) MURs 1158, 1186, 1253 and 1352
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f;

11 C.F.R. § 110.4(c)(2);

2 U.S.C. § 441a(f) and;

26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

Attachment I
(9 pages - 1 of 9)

IV. The pertinent facts in this matter are as follows:

1. Respondent is the principal campaign committee authorized by Lyndon LaRouche to receive contributions and make expenditures in connection with Lyndon LaRouche's candidacy for the Democratic nomination for the office of President in 1980.

2. During that period, Respondent maintained offices throughout the country where volunteers, inter alia, solicited contributions and forwarded them to Respondent's New York headquarters.

3. These volunteers knew that Respondent would submit the collected contributions to the Commission in an effort to obtain presidential primary matching funds.

4. Respondent, through its volunteers, violated 2 U.S.C. § 441f by knowingly accepting the following contributions made by one person in the name of another:

(A) MUR 1158

(1) $250 cashier's check in the name of Harold Harrison dated 1/14/80.

(2) $150 money order in the name of Anne R. Taylor dated 11/20/79.

(3) $1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

(1) $250 money order signed "Robert Hart" and dated 12/10/79 (no accompanying signature document).

(2) $125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(3) $120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(4) $100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).

(5) $100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).

(6) $135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(7) $85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(8) $80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(9) $55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

5. Respondent, through its volunteers, violated 11 C.F.R. § 110.4(c)(2) by accepting and retaining the following cash contributions, which when added to the contributors' previous contributions, exceeded, in the aggregate, $100 in cash for each of the respective contributors:

(A) MUR 1158

(1) $40 cash contribution made by Ernest Pulsifer.

(2) $150 cash contribution made by Ernest Pulsifer.

(3) $250 cash contribution made by Nancy Radcliffe.

(4) $400 cash contribution made by Belinda F. deGrazia.

The Commission has not alleged that these were knowing and willful violations.

6. Respondent, through its volunteers, violated 2 U.S.C. § 441a(f) by knowingly accepting the following contributions which were in violation of contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(A):

(A) MUR 1158

(1) $1,009.58 check from David Sanders.

(B) MUR 1253

(1) $2,713.53 in contributions from Rochelle Ascher;

(2) $1,742.15 in contributions from Karen Brubaker;

(3) $1,024.48 in contributions from John Covici;

(4) $1,279.55 in cntributions from Joseph D'Urso;

(5) $3,378.34 in contributions from Elliot Eisenberg;

(6) $2,067.32 in contributions from Jeffrey Forrest;

(7) $1,409.59 in contributions from Gregory Garnier;

(8) $5,120.32 in contributions from Laurence Gray;

(9) $3,681.32 in contributions from Marjorie Mazel Hecht;

(10) $1,285.87 in contributions from Marsha Kokinda;

(11) $1,738.68 in contributions from Melvin Johnson;

(12) $1,763.76 in contributions from Michael Smedberg;

(13) $1,005.44 in contributions from Martin Simon;

(14) $1,507.65 in contributions from David W. Thill;

(15) $2,403.90 in contributions from Andrew Wilson;

(16) $1,025 in contributions from August F. Arace;

(17) $1,043 in contributions from James M. Duree;

(18) $1,105 in contributions from Shirley Fingerman;

(19) $1,030 in contributions from John Holly;

(20) $1,044 in contributions from T. J. Hopkins;

(21) $1,150 in contributions from Sherri S. Lightner;

(22) $1,100 in contributions from John Pellicano;

(23) $1,100 in contributions from John Ryman;

(24) $1,120 in contributions from John J. Sakala;

(25) $1,125 in contributions from Walter J. Stevens;

(26) $1,010 in contributions from James Taylor;

(27) $1,030 in contributions from Verne Tomlins;

(28) $1,515 in contributions from Carleton Williams;

(29) $1,580 in contributions from Frederic L. Young;

(30) $2,375 in contributions from Donald J. Carr;

(31) $2,030 in contributions from Ellen G. Scott;

(32) $1,050 in contributions from Belinda F. deGrazia;

(33) $1,250 in contributions from Alexander Ward;

(34) $1,125 in contributions from Mary F. Cummings;

(35) $1,075 in contributions from James M. Everette;

(36) $1,250 in contributions from Michael Micale.

The Commisson has not alleged that these were willful violations.

7. Respondent, through its volunteers, violated 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully submitting

(3 of 9)

false and/or misleading information to the Commission in an attempt to obtain matching funds with regard to the following contributions:

(A) MUR 1158

(1) $35 money order signed "William Hayden" and dated 1/8/80.

(2) $150 money order signed "Ernest Pulsifor" and dated 12/4/79.

(3) $250 money order signed "Nancy Radcliff" and dated 9/12/79.

(4) $250 money order signed "Robert A. Robinson" and dated 9/12/79.

(5) $140 money order signed "Kevin Salisbury" and dated 1/12/80.

(6) $450 money order signed "Kevin Salisbury" and dated 1/21/80.

(7) $70 money order signed "Charles Clark" and dated 11/13/79.

(8) $150 money order signed "Anne R. Taylor" and dated 11/20/79.

(9) $45 money order signed "David Sanders" and dated 11/25/79.

(10) $25 money order signed "David Sanders" and dated 1/3/79.

(11) $1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.

(12) $400 money order signed "Belinda F. deGrazia" and dated 1/22/80.

(13) $250 cashier's check and signature document for Dr. Harold Harrison.

(B) MUR 1186

(1) $40 money order signed "Harold Harper" and dated 7/17/79 accompanied by signature document dated 12/7/79.

(C) MUR 1352

(1) $200 money order signed "William Lerch" and dated 11/19/79.

(2) $55 money order signed "William Lerch" and dated 12/7/79.

(3) $135 money order signed "Sherri Waffle" and dated 12/7/79.

(4) $85 money order signed "Sherri Waffle" and dated 12/7/79.

(5) $80 money order signed "Sherri Waffle" and dated 12/7/79.

(6) $125 money order signed "Janice Hart" and dated 12/7/79.

(7) $120 money order signed "Janice Hart" and dated 12/7/79.

(8) $100 money order signed "Victoria Lacey" and dated 12/10/79.

(9) $50 money order signed "Victoria Lacey" and dated 12/10/79.

(10) $250 money order signed "Robert Hart" and dated 12/10/79.

(11) $100 money order signed "Paul Greenberg" and dated 12/10/79.

(12) $100 money order signed "Paul Greenberg" and dated 12/11/79.

V. The Commission has treated the matters described in this document as civil violations.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of fifteen thousand dollars

($15,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1) One initial payment of $5,000, due on December 1, 1982;

2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of $1,000 each;

3) Each such installment shall be paid on the first day of the month in which it becomes due;

4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VII. Respondent agrees that it shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with

this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action by the Commission with regard to the matters set forth in this agreement. It is the understanding of the Respondent and the Commission that the execution of this agreement will result in the termination of all pending Matters Under Review concerning the respondent as of the present date, and that this agreement constitutes complete satisfaction of all such pending Matters Under Review.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

Charles N. Steele
General Counsel

Date

By: Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

(959)

BEFORE THE FEDERAL ELECTION COMMISSION

2001 27 P1:59

In the Matter of Debra Hanania Freeman) MUR 1158

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

Attachment II
(4 pages - 1 of 4)

1. Respondent was a volunteer agent for the Citizens for LaRouche Campaign Committee during the 1980 presidential primary campaign.

2. As such, Respondent solicited and collected campaign contributions in and around Baltimore, Maryland for the Citizens for LaRouche committee and forwarded them to LaRouche headquarters in New York.

3. Respondent was aware that the contributions which were forwarded to New York would be submitted by Citizens for LaRouche to the Federal Election Commission in an effort to obtain presidential primary matching funds.

4. On or about January 14, 1980 respondent withdrew $750 from her personal savings account at the Maryland National Bank and used part of that withdrawal to purchase cashier's check No. 3441224 in the amount of $250.

5. Cashier's check No. 3441224, along with a contribution acknowledgement document purportedly signed by Harold H. Harrison, M.D., was forwarded to the New York headquarters of Citizens for LaRouche and subsequently submitted to the Federal Election Commission for the purpose of receiving matching funds.

V. The above facts reveal that Respondent committed the following violations:

1. 2 U.S.C. § 441f by making a contribution to Citizens for LaRouche in the name of another, to wit, Harold H. Harrison, M.D.

2. 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully furnishing false information which misrepresented a material fact, to wit, Maryland National Bank cashier's check No. 3441224 in the amount of $250, to the Commission in an effort to obtain presidential primary matching funds for Citizens for LaRouche.

VI. The Commission has treated the matters described in this document as civil violations.

VII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two thousand five hundred dollars ($2,500) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that she shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action with regard to the matters set forth in this agreement or in MUR 1158 as it pertains to this respondent.

XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

Date

By: Kenneth A. Gross
Associate General Counsel

Debra Hanania Freeman

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

82 OCT 27

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

On November , 1982, the Commission accepted the conciliation agreement signed by you on behalf of Citizens for LaRouche in settlement of the above-referenced matters. Accordingly, the files have been closed in MURs 1158, 1186, 1253, 1352 and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Citizens for LaRouche wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I also want to remind you that the first payment of $5,000 by Citizens for LaRouche for the civil penalty provided for in the agreement is due on December 1, 1982. The check should be made out to the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Attachment III
(2 pages 1 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mayer Morganroth, Esq.
Heritage Plaza
Suite 335
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1158

Dear Mr. Morganroth:

On November , 1982, the Commission accepted the conciliation agreement signed by you on behalf of respondent Debra Freeman in settlement of the above-referenced matter. Accordingly, the file has been closed and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should Debra Freeman wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. I remind you that the agreement does require that Ms. Freeman pay a civil penalty of $2,500 within thirty days. Payment should be made to the order of the U.S. Treasury.

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

(2 of 2)

October 7, 1982

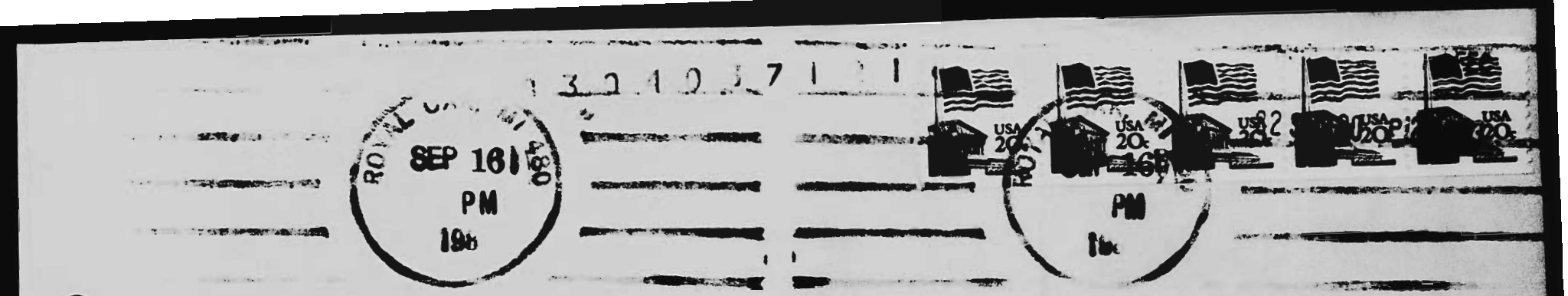
MEMORANDUM TO: Marjorie Emmons

FROM: George Demougeot

SUBJECT: MURs 1158, 1186, 1253 and 1352

Please have the attached Memo distributed to the Commission for the agenda of October 13, 1982. Thank you.

Attachment



Federal Election Commission
Mr. Larry Noble
1325 K Street, N.W.
Washington D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

Mrs. Ellen G. Scott
P.O. Box 48
Fort Edward, N.Y. 12828

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

After considering the circumstances of this matter, the Commission on August 24, 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3 0 4 0 3 7 1 1

Mayer Morganroth, Esquire
24901 Northwestern Highway
Southfield, Michigan 48075

RE: MUR 1374
Citizens for LaRouche

Dear Mr. Morganroth:

On August , 1982, the Commission decided to take no further action in this matter. The entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

Gregory J. Perrin, Esq.
233 Broadway
New York, New York 10007

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

On March 27, 1980, the Commission found reason to believe that your client, Felice Gelman, had violated 26 U.S.C. § 9042(c)(1)(A), a provision of Chapters 95 and 96 of Title 26, U.S. Code in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close the file as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Lois Lerner, attorney in charge of the matter, at (202) 523-4175.

Sincerely,

Charles N. Steele

By: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Rochelle Ascher
461 Westover Hills Blvd.
Richmond, Virginia 23225

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Elliot Eisenberg
5611 N. Glenwood
Chicago, Illinois 60660

RE: MUR 1253
Elliot Eisenberg

Dear Mr. Eisenberg:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lawrence Gray
200 East 27th Street
New York, N.Y. 10016

RE: MUR 1253
Lawrence Gray

Dear Mr. Gray:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Donald J. Carr
6730 Alexander
Saint Louis, MO. 63116

RE: MUR 1253
Donald J. Carr

Dear Mr. Carr:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Marjorie Mazel Hecht
251 West 87 Street
New York, N.Y. 10024

RE: MUR 1253
Marjorie Mazel Hecht

Dear Ms. Hecht:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Andrew Wilson
145 Peachtree Park Drive
Atlanta, Georgia 30309

RE: MUR 1253
Andrew Wilson

Dear Mr. Wilson:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jeffrey Forrest
217 Haven Ave.
New York, N.Y. 10033

RE: MUR 1253
Jeffrey Forrest

Dear Mr. Forrest:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mrs. Ellen G. Scott
P.O. Box 48
Fort Edward, N.Y. 12828

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Gregory J. Perrin, Esq.
233 Broadway
New York, New York 10007

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

On March 27, 1980, the Commission found reason to believe that your client, Felice Gelman, had violated 26 U.S.C. § 9042(c)(1)(A), a provision of Chapters 95 and 96 of Title 26, U.S. Code in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close the file as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Lois Lerner, attorney in charge of the matter, at (202) 523-4175.

Sincerely,

Charles N. Steele

By: _____
Kenneth A. Gross
Associate General Counsel

August 11, 1982

MEMORANDUM TO: Marjorie Emmons

FROM: Steven Barndollar

SUBJECT: MURs 1158,1186,1253,1352, & 1374

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 1158, 1186, 1253, 1352, and 1374
Citizens for LaRouche, et al.)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on August 24, 1982, do hereby certify the Commission took the following actions in the above-captioned matters:

1. [redacted]

2. [redacted]

3. Decided by a vote of 5-1 to take no further action in MUR 1186 with respect to Felice Gelman, and close the file as it pertains to her.

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively. Commissioner Aikens dissented.

0 0 0 3 7 1 3

4. Decided by a vote of 6-0 to take no further action in MUR 1253 with respect to Rochelle Ascher; Elliott Eisenberg; Jeffrey Forrest; Lawrence Gray; Marjorie Mazel Hecht; Andrew Wilson; Donald J. Carr; and Ellen G. Scott, and close the file as it pertains to each.

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

5. Decided by a vote of 6-0 to take no further action in MUR 1374 and close the file.

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

6. Decided by a vote of 6-0 to approve the letters attached to the General Counsel's August 11, 1982 report.

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively.

7. _____

Attest:

8-24-82
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

August 23, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT:

Please have the attached Memo to the Commission distributed to the Commission immediately. It is an addendum to a document that is on the agenda of August 24, 1982.

Thank you.

Attachment

cc: Noble

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

82 AUG 23 P 2: 07

August 23, 1982

SENSITIVE

MEMORANDUM

EXECUTIVE SESSION
AUG 24 1982

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT:

In light of the discussion concerning MURs 281, 328, 368 and 298 at the August 17, 1982 Commission meeting, we have prepared a substitute page 23 to be inserted into our August 11 memorandum. The new page contains a footnote addressing those MURs, and adds MUR 1253 to recommendation #1.

RECEIVED
THE
ARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 AUG 12 P4: 51

August 12, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: I

The attached is a new page number 2 for the above-referenced General Counsel's Memorandum, circulated on August 11, 1982. Due to a machine error, the last two lines of the footnote at the bottom of page 2 were inadvertently omitted from the original of the memorandum.

A. MUR 1158

This matter arose during a review of CFL's third matching fund submission. Auditors discovered that several money orders submitted for matching funds contained signatures patently dissimilar from signatures found on other instruments purportedly signed by the same individuals. Many of the signatures on the instruments bore a strong resemblance to handwriting on checks contributed by Debra Hanania Freeman, CFL Committee Representative for Baltimore. An additional irregularity appeared on a cashier's check purportedly contributed by Dr. Harold Harrison. The check contained the notation:

> CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)

The notation appears to have been typed by two different typewriters, the added words implying that Harrison, rather than Freeman, requested the check. The signature card submitted as documentation for the contribution listed an address for Harold H. Harrison, M.D.; however, no one by that name was found at that address. Furthermore, the signature on Harrison's signature card closely resembled the signature on an contribution check attributed to another individual.

On February 12, 1980, the Commission found reason to believe that Debra Hanania Freeman had violated 26 U.S.C. § 9042(c)(1)(A) and 2 U.S.C. § 441f with respect to the above-described instruments. The Commission authorized the taking of eight depositions and, on February 2, 1981, based on those depositions found reason to believe that CFL had violated 2 U.S.C. §§ 441f and 441g,[2/] 26 U.S.C. § 9042(c) and 11 C.F.R. § 110.4(c)(2). Eighteen additional depositions were authorized, five of which have been taken. Attempts to locate the remaining individuals involved have been unsuccessful.

The following summarizes the testimony taken in MUR 1158:

1) Reverend William Hayden was shown a $35 money order made out to CFL with his name and address printed on the sender line. He said he had never seen the money order nor had he ever contributed anything to CFL. He said he had given $35 cash to Robert Primack for an annual membership in the National Anti-Drug Coalition (NADC) Conference. He has not seen or heard from Primack since then.

2/ 2 U.S.C. § 441g applies to people who contribute over $100 in cash. CFL did not make cash contributions, rather it received them. Therefore, 11 C.F.R. § 110.4(c)(2) is more appropriately applied here.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY RANSOM

DATE: AUGUST 12, 1982

SUBJECT: OBJECTION -

The above-named document was circulated to the Commission on August 12, 1982 at 11:00AM.

Commissioner Harris submitted an objection to this matter on August 12, 1982 at 2:41 PM.

This matter will be placed on the agenda for the Executive Session of August 17, 1982.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS /JODY C. RANSOM jcr
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: AUGUST 16, 1982

SUBJECT: ADDITIONAL OBJECTIONS - I

You were notified previously of an objection by Commissioner Harris.

Commissioners Reiche and McDonald submitted additional objections to this matter.

This matter will be discussed in executive session on Tuesday, August 17, 1982.

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 11, 1982

82 AUG 11 P5:22

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT:

MURs 1158, 1186, 1253, 1352, and 1374

following memorandum first discusses the background of each MUR, then describes the statutory sections that were violated and how they were violated with respect to the individual MURs.1/ In addition, there is a third section comprised of miscellaneous matters arising out of the CFL investigations. The final section contains the recommendations of the Office of General Counsel.

I. BACKGROUND

On December 18, 1979, the Commission qualified Citizens for LaRouche (CFL) to receive matching funds for the 1980 presidential primary campaign. During audits conducted pursuant to that qualification, certain irregularities were noted in the documentation submitted by CFL. The Commission undertook investigations into those irregularities which are summarized as follows:

1/

A. MUR 1158

This matter arose during a review of CFL's third matching fund submission. Auditors discovered that several money orders submitted for matching funds contained signatures patently dissimilar from signatures found on other instruments purportedly signed by the same individuals. Many of the signatures on the instruments bore a strong resemblance to handwriting on checks contributed by Debra Hanania Freeman, CFL Committee Representative for Baltimore. An additional irregularity appeared on a cashier's check purportedly contributed by Dr. Harold Harrison. The check contained the notation:

> CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)

The notation appears to have been typed by two different typewriters, the added words implying that Harrison, rather than Freeman, requested the check. The signature card submitted as documentation for the contribution listed an address for Harold H. Harrison, M.D.; however, no one by that name was found at that address. Furthermore, the signature on Harrison's signature card closely resembled the signature on an contribution check attributed to another individual.

On February 12, 1980, the Commission found reason to believe that Debra Hanania Freeman had violated 26 U.S.C. § 9042(c)(1)(A) and 2 U.S.C. § 441f with respect to the above-described instruments. The Commission authorized the taking of eight depositions and, on February 2, 1981, based on those depositions found reason to believe that CFL had violated 2 U.S.C. §§ 441f and 441g,[2/] 26 U.S.C. § 9042(c) and 11 C.F.R. § 110.4(c)(2). Eighteen additional depositions were authorized, five of which have been taken. Attempts to locate the remaining individuals involved have been unsuccessful.

The following summarizes the testimony taken in MUR 1158:

1) Reverend William Hayden was shown a $35 money order made out to CFL with his name and address printed on the sender line. He said he had never seen the money order nor had he ever contributed anything to CFL. He said he had given $35 cash to Robert Primack for an annual membership in the National Anti-Drug Coalition (NADC) Conference. He has not seen or heard from Primack since then.

2/ 2 U.S.C. § 441g applies to people who contribute over $100 in cash. CFL did not make cash contributions, rather it received

2) Ernest K. Pulsifer testified that Lawrence Freeman had solicited him by telephone in late 1979. He met with Freeman and his wife Debra, and discussed LaRouche's campaign. He then went to CFL campaign headquarters and gave a $100 cash contribution to Mr. Freeman. Pulsifer gave cash contributions to Lawrence Freeman on two other occasions; one for $40 and one for $150. When shown a $150 money order ostensibly signed by him, Pulsifer denied ever having seen it before and pointed out that his name was spelled incorrectly on the money order.

3) Nancy Radcliffe testified that she was a CFL volunteer for the 1980 campaign. She admitted making a $250 cash contribution to CFL which she gave to Debra Freeman. When shown a $250 money order purportedly signed by her, Radcliffe denied purchasing it or signing it and noted that her name was spelled incorrectly on the money order. Radcliffe said that Debra Freeman had purchased it and that she (Radcliffe) had seen the completed money order among a group of other contributions being sent to the CFL office in New York. Radcliffe then produced a document in which she had acknowledged making a $250 contribution to CFL on September 10, 1979.3/ She indicated that Debra Freeman had asked her to sign the document on February 28, 1980. Although Radcliffe stated that she had seen Freeman regularly during the period between September 10, 1979 and February 28, 1980, she could offer no explanation why Freeman had waited six months to have her acknowledge the contribution.4/

Radcliffe was also asked about two personal checks she had contributed. The name Robert Primack was imprinted on the checks, while Radcliffe's name was added with a pen. She indicated that it was a joint checking account, but was unwilling to provide any information concerning Primack. (This is the same Robert Primack referred to by Rev. William Hayden. See 1, supra. Efforts to locate Primack have failed.)

3/ This document was not in the Commission's files.

4/ It is noteworthy that February 28, 1980, the date of the acknowledgement, is only nine days after Freeman was notified of the Commission's reason to believe finding against her.

4) Dr. Robert A. Robinson stated that he had contributed checks to CFL, but never money orders. When shown a $250 money order signed Robert A. Robinson, he stated that it was not his signature nor did it appear to be that of his son, Robert A. Robinson, Jr., who had once lived at the address shown on the money order. Dr. Robinson was then shown another $250 money order with the name Robert A. Robinson, Jr. printed on the signature line. Dr. Robinson did not recognize the printing on the money order and pointed out that the house number on the address was different from the number on the previous money order.

5) Kevin Salisbury stated that he had contributed to LaRouche, but could not recall how much or whether the contributions were by cash or check. He did recall that he had given the contributions to Debra Freeman. When shown a $140 money order signed "Kevin Salisbury" he could not recall whether he had purchased it or had ever seen it. He did testify that the signature was not his. Salisbury was uncooperative when asked about the circumstances surrounding the purchase of a $450 money order, but did state that none of the printing on it was his. He pointed out that the letters t and p in the word "apt." in the address were transposed. An acknowledgement card admittedly signed by Salisbury contained the same mistake, leading to the conclusion that the money order was filled out by someone after the acknowledgement was signed.

6) Charles Clark's testimony was confusing, however, he seemed to indicate that he had purchased tickets to LaRouche fundraisers on three occasions. The tickets cost $25, $20 and $15, but it appears as though Clark paid for them in installments by giving $5-$10 at a time to Debra Freeman or Steve Warm. It was Warm who asked him to sign an acknowledgement that he had contributed $70 to CFL. It was Warm who told him that his contributions totalled $70. When shown the $70 money order in his name, Clark said he had never contributed a money order nor had he made a single $70 contribution.

7) Ann A. Taylor - When shown a money order for $150 containing her address and signed "Anne R. Taylor", Ms. Taylor stated that she had never purchased a money order in her life nor had she ever contributed to CFL. In addition, she noted that the spelling of her first name was incorrect and the middle initial in the signature was different than hers.

8) David Sanders denied purchasing or signing both a $45 and a $25 money order purportedly signed by him. He said he had given cash contributions to CFL and assumed that they were turned into money orders so they could be sent through the mail, but he never instructed anyone to purchase the money orders for him. Sanders was shown one of two signed acknowldgements submitted to the Commission which stated that he had contributed a $45 money order to CFL. He testified that the signature on it was not his. (Sanders was not shown the second acknowledgement.) Sanders was also asked about a $1,009.58 check from Household Finance made out to him and endorsed over to CFL. He stated that he had obtained a personal loan to buy furniture, but decided to give the money to CFL instead. He was then shown an acknowledgement of that contribution signed by David Sanders and by Lenore Sanders as his spouse. Sanders indicated that he did not know a Lenore Sanders. His wife's name is Diana Sayoun. He could not recall whether the Lenore Sanders signature had appeared on the acknowledgement when he signed it.5/ He also testified that the $1,009.58 contribution was his alone, and that he was never told by anyone at CFL that it was illegal to contribute over $1,000 to one campaign.

9) Diana Sayoun was shown the acknowledgement document containing the name Lenore Sanders. Sayoun stated that she did not sign it, she had never used the name Lenore Sanders and she did not know Lenore Sanders. She did state that she had once received a letter from the U.S. Labor Party addressed to Lenore Sanders. Sayoun said that someone from the U.S. Labor Party had tried to get her to sign a contribution acknowledgement, but she refused because she had never contributed. She said her

---

5/ Sanders was a difficult witness. Even after he testified that his wife's name is Diana Sayoun, he would not state that the "Lenore Sanders" appearing on the acknowledgment was not his wife's signature.

husband had told her that the $1,009.58 check was a loan to the U.S. Labor Party which they repaid in monthly installments. However, she indicated that she did not believe him, but felt that he had told her that story so she would not be angry with him because he had contributed such a large amount to the U.S. Labor Party.

10) Belinda deGrazia Haight was shown a $400 money order and signature acknowledgement document signed "Belinda F. deGrazia". She denied signing the money order and stated she had given a $400 cash contribution to Debra Freeman.

11) Steven Warm was shown a $100 money order with his name on it. He did not recall the money order nor did he think he signed it. He stated he had made one money order contribution, but did not know if the money order shown was the one he contributed. He indicated he may have contributed cash and someone else bought the money order. He admitted the signature on the accompanying acknowledgement document was his, but could not recall who had asked him to sign it. When told his money order and that of Belinda deGrazia were consecutively numbered, he indicated he had no explanation for the coincidence.

    When asked about the Charles Clark money order, Warm said he had received cash contributions from Clark, but recalled no money orders. He said Clark probably gave cash and a money order was purchased with the cash. He stated he knew there were times when the Baltimore office of CFL purchased money orders to represent cash contributions. He further stated that this was done on the basis of instructions from CFL national headquarters.

12) George B. P. Ward, Jr., vice president for the Maryland National Bank testified concerning the bank records of Debra Hanania Freeman. The records were subpoenaed in an effort to learn more about the earlier described $250 cashier's check ostensibly contributed by Dr. Harold H. Harrison.6/

6/ No Dr. Harold H. Harrison was ever located. The only Dr. Harold Harrison listed in Baltimore is Dr. Harold E. Harrison, who, by interrogatory, denied ever contributing to CFL.

Those records indicated that Debra Freeman had withdrawn $750 from her own account and used $250 of that money to purchase the cashier's check. The bank copy of the check contained only the notation typed "CUSTOMER REQUEST BY: DEBRA HANANIA FREEMAN" indicating the other information was added after the purchase.

13) Debra Hanania Freeman testified that she sometimes purchased money orders for people who made cash contributions, but only after the contributor had consented to the purchase and filled out an acknowledgement. When asked why many acknowledgements were dated long after the money orders, she said sometimes the people in CFL's New York Office called to say they needed an acknowledgement for someone because they had lost one or had none on file and were about to make a submission. She also testified that other volunteers sometimes gave her cash which they had collected and asked her to buy money orders for the contributors. She testified that she understood she could fill out the money orders as long as the contributors signed contribution acknowledgements.7/ Freeman admitted purchasing the Harold Harrison cashier's check. She said "someone" had given her a pledge envelope with Harrison's $250 in it and asked her to buy a money order with it. She took the money to her bank and obtained a cashier's check instead because her bank provided free cashier's checks to its customers. She did not explain why she had purchased money orders on all other occasions, nor did she indicate that she had withdrawn the money for the cashier's check from her account. When asked about the typed notation on the check, Freeman said the additional typing was not on the check when she submitted it to CFL in New York.

Freeman was asked to provide handwritting exemplars for all questioned documents. Although she provided some, her attorney advised her not to continue with them absent a court order.

14) Felice Gelman -- see discussion in MUR 1186, infra.

7/ Freeman indicated that she received her instructions concerning contributions from the New York Office of CFL, through Felice Gelman.

B. MUR 1186

During their review of threshold submissions the auditors found twelve money orders, each listing a name and an Oregon address, but each failing either to contain the requisite signature or to be accompanied by a signed acknowledgement document. On Friday, December 7, 1979, Felice Gelman of CFL was informed that the signatures were required in order for the contributions to be matchable. Three days later CFL submitted the twelve acknowledgement documents. Because the speed with which the documents were obtained raised questions concerning their legitimacy, confirmation letters were sent out in an effort to verify them.

Of the six responses received, five verified their contributions. The sixth letter came from Harold Harper who indicated that he had purchased a subscription to "their" (CFL) newspaper for $20 per year and two copies of "their" book, Dope, Inc. for $5 per copy, however, he did not consider those payments to be contributions. In addition, Harper stated that he had paid for all items by cash, not money order. The information provided by Harper differed from that submitted by CFL in three significant respects: the amount paid ($30 vs. $40); the method of payment (cash vs. money order); and the purpose of the payments (purchases vs. contributions). Based on that conflicting information, the Commission found reason to believe that CFL and its treasurer, Felice Gelman, knowingly and willfully submitted false information to the Commission in violation of 26 U.S.C. § 9042(c). Interrogatories were sent to CFL requesting the name of the CFL representative in Oregon who had submitted the Harper money order. Subpoenas for depositions were then issued to the six people who had not responded to the confirmation letters, to Felice Gelman and to Martin Simon, the identified submitter of the Harper money order. Only one "contributor" was not deposed.

Those deposed indicated that they had either purchased the money orders in question or given Martin Simon cash and authorized him to purchase money orders for them. In some cases Simon returned with the money orders and the contributors filled them out, while in others Simon presumably filled out the money orders. All contributors stated that Simon requested them to sign a document acknowledging their contributions. Each of those documents listed the dates and the amounts of the contributions, and specified "money order" as the method of payment. In all cases, the contributors acknowledged their contributions.

Martin Simon testified that he was a full time volunteer for CFL and was the coordinator for Oregon fundraising. He stated that inasmuch as the national strategy of CFL was to qualify for matching funds, he discouraged cash contributions. He further stated that he explained to contributors the matchability

requirement of a written instrument and either went with them to buy a money order or secured one for them. Simon was able to obtain money orders at no cost at his bank. According to Simon, if he obtained the money order, he made a copy of the receipt for his records and sent a copy to the contributor. Simon indicated that he was not aware of the signature requirement until CFL notified him that the money orders in question had been rejected for matchability. Simon also testified that he kept a separate accounting of cash receipts whether they be contributions or payments for literature. Such amounts were sent to New York via an all inclusive money order containing an explanatory notation.

When questioned concerning Harold Harper, Simon indicated that Harper had made one $40 cash contribution in 1979. Simon stated that Harper originally told Simon that he would have his wife make out a check and mail it. When Simon did not receive it, he contacted Harper who said that the check had been sent. Harper added that he would have the post office trace it. Simon asserted that Harper then told Simon to come to his place of business and he would give him another check. According to Simon's testimony, when he arrived Harper had forgotten his checkbook so he gave Simon $40 cash. Simon said he subsequently obtained a $40 money order and sent Harper a copy.8/

Harper's description of the situation is quite different. In a sworn affidavit he indicated that he had been solicited by CFL for contributions several times, but always refused to contribute. In the fall of 1978 he purchased a subscription to "their" paper, New Solidarity, at a cost of $20 for the year. He did this in order to learn more about LaRouche, not to contribute to his campaign. He paid for the subscription in cash. When the subscription expired Harper told Martin Simon he wished to renew it and sent Simon a money order for $20. Harper was certain that he never told Simon that he was making a "contribution", nor did he say he would have his wife send Simon a check. The $20 money order was lost in the mail and, at Simon's request, Harper paid him for the subscription in cash. Harper also stated that he had purchased two copies of Dope, Inc. at $5 per copy and had paid Simon $10 in cash for the books. He did not intend the $10 as a contribution. Harper admitted that he had signed the acknowledgement document, but only after CFL representatives bothered him at work while he was very busy. He signed the acknowledgement without reading it, or knowing specifically what it would be used for.

8/ This version of what occurred is strikingly similar to Simon's version of what occurred with contributor Richard Wise. Wise confirmed his money order contribution.

Finally, Harper emphasized that he had never purchased a $40 money order or sent one to CFL, nor had he authorized anyone to purchase or send one for him. He had never been shown the money order which was submitted in his name, nor had he received a copy of it.

Felice Gelman, former treasurer of CFL was also deposed. Interrogatories answered by CFL indicated that Ms. Gelman had contacted Simon about CFL's immediate need of the twelve signature acknowledgement documents, and that she had helped Simon prepare the acknowledgement documents. At her deposition, Ms. Gelman was asked about the Harold Harper money order, as well as the Dr. Harold Harrison cashier's check from MUR 1158. She refused, upon advice of counsel, to answer any questions concerning her dealings with CFL. Her counsel stated that since the Commission's finding that there was reason to believe that Ms. Gelman knowingly and willfully violated 26 U.S.C. § 9042(c) exposed her to possible criminal sanctions, he must advise her not to answer any questions.

C. MUR 1253

During their required field work conducted pursuant to 26 U.S.C. § 9038(a), the FEC auditors discovered that 15 individuals apparently incurred obligations on behalf of CFL in excess of $1,000, in violation of the contribution limitations of 2 U.S.C. §§ 441a(a) and 441a(f), and referred this matter (subsequently denoted MUR 1253) for possible compliance action. On January 22, 1981, the Commission found reason to believe CFL violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the fifteen individuals, and notified CFL of that finding.

While MUR 1253 was pending before the Commission in the investigative stage, additional materials concerning other individuals who apparently made excessive contributions to CFL were obtained through the post-primary audit and report review processes. These matters which had been denominated MURs 1262 and 1344 were, by vote of the Commission, merged with MUR 1253 on June 16, 1981, as they involved a common nucleus of facts and the possible violation of the same statutory section. Also on that date, the Commission found reason to believe that eight individuals[9/] had violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to CFL in excess of $1,000, and that CFL violated 2 U.S.C. § 441a(f) by accepting excessive contributions from 21 individuals.

9/ These individuals are Rochelle Ascher, Elliot Eisenberg, Jeffrey Forrest, Lawrence Gray, Marjorie Mazel Hecht, Andrew Wilson, Donald J. Carr and Ellen G. Scott.

D. MUR 1352

This matter arose when the Audit Division referred three patterns of irregularities[10] discovered during its review of CFL's records to the Office of General Counsel. One pattern noted involved a large number of money orders issued from two Chicago banking entities and deposited in CFL's New York headquarters between December 10 and 17, 1979. The serial numbers and dates on these money orders indicate that many were consecutively numbered and had been purchased on the same date. A total of thirty-one money orders received from twenty-three contributors were reviewed.[11] Many of the money orders purportedly contributed by the same individuals contained patently different signatures.[12] In addition, the payee line of most of the instruments appeared to be filled out by the same hand. The auditors also noted that twenty-one of the twenty-three contributors were listed as "unemployed".

On August 7, 1980, pursuant to 26 U.S.C. § 9039, the Commission authorized the taking of twenty-three depositions in the matter, however, United States Marshals were only able to serve eleven of the individuals, nine of whom were deposed. On October 24, 1980, the United States District Court for the District of Columbia found that the Commission did not have jurisdiction to pursue the matter under 26 U.S.C. § 9039. (Gelman v. Fed. Election Comm'n.) Subsequently, on March 16, 1981, pursuant to 2 U.S.C. § 437g, the Commission found reason to believe that CFL knowingly and willfully submitted false information to the Commission, in violation of 26 U.S.C. § 9042(c). Authorization was given for the taking of seventeen depositions, however, only two of the seventeen individuals were ever served with subpoenas.[13]

10/ As indicated in the May 7, 1982 Comprehensive Investigative Report, one pattern noted by the auditors concerned four money orders purchased from the Chase Manhatten Bank. Upon observation, the date and payee lines on all four instruments appeared to have been filled out by the same hand. Another concerned three consecutively numbered $200 money orders issued by the Bank of New York. One of the three, purportedly signed by CFL volunteer Joyce Rubinstein, appeared to have had the date filled out by the same hand as the four purchased at the Chase Manhattan Bank. Upon consideration, it appeared that neither of these situations reflected a violation, therefore, they did not warrant further investigation.

11/ Twenty-three of these were submitted for matching funds.

12/ Seven of the people involved are known LaRouche volunteers.

13/ All efforts to serve the others, including the use of Pinkerton Agents, have failed.

Of the nine individuals deposed in Chicago, eight testified that they had been unemployed for the last year, during which time they had volunteered for CFL. When confronted with money orders ostensibly signed by them, the "contributors" responded as follows:

1) Robert Hart, Janice Hart and Paul Greenberg denied ever purchasing or signing the money orders and stated that they "could not recall" making contributions in the amounts shown on the money orders;

2) Sander Peretz Fredman testified that he had purchased money orders for himself and, at the instruction of Elliot Eisenberg,14/ had also purchased other money orders. When faced with three consecutively numbered money orders containing the signature "Sherri Waffle", Fredman testified that he "might" have purchased and signed them for his friend Ms. Waffle.

3) Victoria Lacey testified that she had made three contributions to CFL: a $100 check; a $100 money order; and a $50 money order. She admitted signing the $50 and $100 money orders shown to her, but said someone at CFL had purchased them. She "could not recall" whether she had paid for them before or after they were purchased and stated that many people at CFL were involved in purchasing money orders. Lacy also stated that December 10, 1979, the date on both her money orders, was the date of a big CFL fundraising event.15/ When shown a third money order purportedly signed by her, Lacy initially denied purchasing it, but later admitted both purchasing and signing it. Her description of the circumstances surrounding its purchase is questionable. She testified that she took the $250, which she had received as a gift from her parents, with her to Lombard, a town 90 miles from Chicago, on a day she was campaigning for contributions. She purchased the money order in Lombard rather than buying it in Chicago, but provided no explanation for doing so.

14/ Eisenberg's name surfaces throughout the depositions as the person who managed campaign financing. We have been unable to depose Eisenberg as he has evaded all efforts to serve him.

15/ Sixteen of the twenty money orders discussed here are dated within three days of the December 10, 1979 fundraiser. In addition, some consecutively numbered money orders contained dates several days apart, leading to the conclusion that money orders may have been purchased in blocks and filled in as needed.

4) John Brown, Jr. testified that he made contributions to CFL by putting money in a slot in the "campaign desk" in the CFL office. He also put cash receipts from the sale of materials in or on that desk. Brown said he did not know who gathered the money or what happened to it after it was left in the desk. Brown admitted signing a $120 money order shown to him, but "did not know" whether he had purchased it or whether he had even contributed $120 to CFL.

5) Robert E. Pierce testified that he has purchased several money orders for CFL including one from a Missouri bank. Pierce said he gave these money orders to Elliot Eisenberg who oversaw Pierce's fundraising activities. Pierce stated that he put the contributions he had collected into the "fundraising desk". When shown a $100 money order with his name on it, Pierce admitted signing it, but said Gerald Pechenuk had purchased it. He had given Pechenuk cash, but "could not recall" whether he had instructed Pechenuk to purchase a money order.

6) Mitchell Hirsch stated that he had gone with other CFL members to purchase money orders, however, all money orders he purchased were for his own contributions. Hirsch recalled purchasing and signing both money orders attributed to him, but did not recall accompanying Gerald Pechenuk to purchase the December 13, 1979 money order even though Pechenuk's December 13, 1979 money order lists the next consecutive number to Hirsch's. Hirsch recalled soliciting a credit card contribution from William Lerch by telephone. He gave the credit card information Lerch provided to Elliot Eisenberg, but did not have any further information concerning the transaction.

7) William Lerch, the contributor solicited by Mitchell Hirsch, testified that he had charged two contributions on his credit card -- the first for $200, the second for $50. Both contributions were made by telephone. When shown the two money orders attributed to him, Lerch admitted signing the one for $200, but could not recall the circumstances of the signing. He stated that he had authorized the purchase of the money order by his telephone contribution. When shown the $55 money order, Lerch denied ever making a $55 contribution or signing the money order.

8) Gerald Rose was subpoenaed because Janice Hart, Robert Hart, Robert Pierce and Victoria Lacey indicated that he was in charge of the Chicago CFL office. Mr. Rose testified that he was the political director of the office, but had no direct connection with fundraising efforts.

9) Robert Cole was subpoenaed because Janice Hart and Victoria Lacey indicated that they turned collected contributions over to Cole. Cole denied any big part in the fundraising effort. He did not recall receiving contributions from Hart, Lacey or anyone else. He said he merely totalled up figures that were given to him and sometimes counted money. Other than those aspects, he denied any knowledge of, or involvement in, the financial side of the Chicago CFL operation.

E. MUR 1374

This MUR arose from the post-primary audit undertaken pursuant to 26 U.S.C. § 9038(a). On June 16, 1981, the Commission found reason to believe CFL had violated 26 U.S.C. § 9042(c)(1)(A) by submitting false information to obtain matching funds, in connection with purported contributions to CFL that apparently were really loans the committee had previously repaid.

II. DISCUSSION

A) 26 U.S.C. § 9042(c)(1)(A)

The evidence obtained indicates that CFL, through its agent volunteers, knowingly and willfully submitted false or misleading information to the Commission in an attempt to receive matching funds, in violation of 26 U.S.C. § 9042(c)(1)(A), in connection with the following contributions:

1) MUR 1158

a) $35 money order signed "William Hayden." Rev. Hayden denied having made a contribution to CFL, purchasing the money order or signing it.

b) $150 money order signed "Ernest Pulsifor." Debra Freeman admitted purchasing the money order after Pulsifer had made a cash contribution. (Pulsifer's name is spelled incorrectly on the money order.)

c) $250 money order signed "Nancy Radcliff". Debra Freeman admitted purchasing and signing the money order after Radcliffe had made a cash contribution. (Radcliffe's name is spelled incorrectly on the money order.)

d) $250 money order signed "Robert A. Robinson". Dr. Robert A. Robinson said the signature was not his nor did it appear to be that of his son, Robert A. Robinson, Jr. The signature differed greatly from another money order signed "Robert A. Robinson, Jr.".

e) $140 money order signed "Kevin Salisbury". Salisbury did not recall contributing the money order and denied signing the money order. (No separate signature document was submitted.)

f) $450 money order signed "Kevin Salisbury". Salisbury denied ever seeing the money order before the deposition.

g) $70 money order signed "Charles Clark". Debra Freeman admits filling out and signing the money order. Clark testified that he only made cash contributions and never made one, single contribution in the amount of $70.

h) $150 money order signed "Anne R. Taylor". The Ann Taylor found at the address submitted by CFL denied the signature and the contribution.

i) $45 money order signed "David Sanders". Debra Freeman admitted purchasing and signing the money order. Sanders said he contributed cash.

j) $25 money order signed "David Sanders". Sanders denied signing the money order and said the contribution was made in cash.

k) $1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders as spouse. Diana Sayoun, David Sanders' wife denied signing the document and denied making the contribution.

l) $400 money order signed "Belinda F. deGrazia". Belinda F. deGrazia Haight said she made the $400 contribution in cash.

j) $250 money order signed "Robert Hart". Robert Hart denied purchasing or signing it. (No separate signature document was submitted.)

k) $100 money order signed "Paul Greenberg" and dated December 10, 1979. Greenberg denied purchasing or signing it. (No separate signature document was submitted.)

l) $100 money order signed "Paul Greenberg" and dated December 11, 1979. Greenberg denied signing it. (No separate signature document submitted.)

m) $120 money order signed "John H. Brown, Jr.". Brown did not recall purchasing it or making the $120 contribution.

A) 2 U.S.C. § 441f

The evidence indicates that CFL, through its agent volunteers, violated 2 U.S.C. § 441f by knowingly accepting contributions made by one person in the name of another in the following instances:

1) MUR 1158

a) $250 cashier's check in the name of Harold Harrison. Bank records show the funds actually came from Debra Freeman's account.

b) $150 money order in the name of Anne R. Taylor. Ann Taylor testified she never made the contribution.

c) $1,009.58 loan check from Household Finance Company submitted with signature acknowledgement indicating the check was contributed by both David Sanders and Lenore Sanders, his spouse. Diana Sayoun, David Sanders' wife, said she never made the contribution.16/

16/ David Sanders testified that he made the entire $1,009.58 contribution. If that is so, CFL committed a violation by accepting a contribution in excess of contribution limitations. See discussion of 2 U.S.C. § 441a(f), infra.

m) $250 cashier's check and signature document for Dr. Harold Harrison. George Ward, bank Vice President testified that bank records show Debra Freeman purchased the check with funds from her personal account. No Dr. Harold Harrison resided at the address submitted by CFL.

2) MUR 1186

a) $40 money order and signature document signed "Harold Harper". Harper said he gave $30 cash to a CFL representative.

3) MUR 1352

a) $200 money order signed "William Lerch". Lerch admitted the signature but stated he has made the contribution via credit card.

b) $55 money order signed "William Lerch". Lerch denied the signature and denied making any contribution in that amount. (No separate signature document was submitted.)

c) $135 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)

d) $85 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)

e) $80 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)

f) $125 money order signed "Janice Hart". Janice Hart denied purchasing or signing the money order. (No separate signature document was submitted.)

g) $120 money order signed "Janice Hart". Janice Hart denied purchasing or signing the money order. (No separate signature document was submitted.)

h) $100 money order signed "Victoria Lacey". Lacey stated someone else at CFL had purchased it. She did pay for it.

i) $50 money order signed "Victoria Lacey". Lacey did not know who purchased it. She did pay for it.

2) MUR 1352

a) $250 money order signed "Robert Hart". (No accompanying signature document.) Robert Hart denied purchasing or signing the money order and did not recall making a contribution in that particular amount.

b) $125 money order signed "Janice Hart". (No accompanying signature document.) Janice Hart denied purchasing or signing the money order and could not recall making a contribution in that amount.

c) $120 money order signed "Janice Hart". See subsection (b), supra.

d) $100 money order signed "Paul Greenberg". (No accompanying signature document.) Greenberg denied purchasing or signing the money order and said the only contribution he ever made to CFL was a refund check for about $6.00.

e) $100 money order signed "Paul Greenberg". See subsection (d), supra.

f) $135 money order signed "Sherri Waffle". Evidence indicates that Sander Fredman actually purchased, signed and submitted the money order.

g) $85 money order signed "Sherri Waffle". See subsection (f), supra.

h) $80 money order signed "Sherri Waffle". See subsection (f), supra.

i) $55 money order signed "William Lerch". Lerch denies making the contribution.

j) $120 money order signed "John H. Brown, Jr.". Brown admitted signing the money order, but did not recall ever making the contribution.

C) 11 C.F.R. § 110.4(c)(2)

The evidence indicates that CFL, through its agents, violated 11 C.F.R. § 110.4(c)(2) by accepting and retaining[17]/

17/ None of the cash contributions aggregating over $100 was returned to contributor. All were submitted for matching.

contributions exceeding, in the aggregate, $100 in cash in violation of 2 U.S.C. § 441g in the following instances:

1) MUR 1158

a) $40 cash contribution made by Ernest Pulsifer. Pulsifer testified this contribution was made after he had already made a $100 cash contribution.

b) $150 cash contribution made by Ernest Pulsifer. Pulsifer testified this was contributed after he had already made both a $100 and a $40 cash contribution.

c) $250 cash contribution made by Nancy Radcliffe. Radcliffe testified she made the contribution in cash to Debra Freeman.

d) $400 cash contribution made by Belinda F. deGrazia. Belinda deGrazia Haight testified she made the contribution in cash to Debra Freeman.

D) 2 U.S.C. § 441a(f)

The evidence indicates that CFL, through its agent volunteers, knowingly violated 2 U.S.C. § 441a(f) by accepting contributions exceeding the contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(A) in the following instances:

1) MUR 1158

a) $1,009.58 Household Finance Company loan check from David Sanders. Sanders testified that the entire $1,009.58 was contributed by him, alone. Not only does the check exceed the limitation, but Sanders also testified he had made about six other contributions to CFL during the presidential primary campaign, including, specifically, a $45 and a $25 contribution.

2) MUR 1253

(1) $2,713.53 in contributions from Rochelle Ascher;

(2) $1,742.15 in contributions from Karen Brubaker;

(3) $1,024.48 in contributions from John Covici;

(4) $1,279.55 in contributions from Joseph D'Urso;

(5) $3,378.34 in contributions from Elliot Eisenberg;

(6) $2,067.32 in contributions from Jeffrey Forrest;

(7) $1,409.59 in contributions from Gregory Garnier;

(8) $5,120.32 in contributions from Lawrence Gray;

(9) $3,681.32 in contributions from Marjorie Mazel Hecht;

(10) $1,285.87 in contributions from Marsha KoKinda;

(11) $1,738.68 in contributions from Melvin Johnson;

(12) $1,763.76 in contributions from Michael Smedberg;

(13) $1,005.44 in contributions from Martin Simon;

(14) $1,507.65 in contributions from David W. Thill;

(15) $2,403.90 in contributions from Andrew Wilson;

(16) $1,025 in contributions from August F. Arace;

(17) $1,043 in contributions from James M. Duree;

(18) $1,105 in contributions from Shirley Fingerman;

(19) $1,030 in contributions from John Holly;

(20) $1,044 in contributions from T. J. Hopkins;

(21) $1,150 in contributions from Sherri S. Lightner;

(22) $1,100 in contributions from John Pellicano;

(23) $1,100 in contributions from John Ryman;

(24) $1,120 in contributions from John J. Sakala;

(25) $1,125 in contributions from Walter J. Stevens;

(26) $1,010 in contributions from James Taylor;

(27) $1,030 in contributions from Verne Tomlins;

(28) $1,515 in contributions from Carleton Williams;

(29) $1,580 in contributions from Frederic L. Young;

(30) $2,375 in contributions from Donald J. Carr;

(31) $2,030 in contributions from Ellen G. Scott;

(32) $1,050 in contributions from Belinda F. deGrazia;

(33) $1,250 in contributions from Alexander Ward;

(34) $1,125 in contributions from Mary F. Cummings;

(35) $1,075 in contributions from James M. Everette;

(36) $1,250 in contributions from Michael Micale.

Contributions 1-15, listed above, were given in the form of advances made by individuals on behalf of CFL.18/

Contributions 16-36, listed above, consisted of outright gifts to CFL which, in the aggregate, exceeded each individual's contribution limitation.

The Office of General Counsel recommends that the Commission seek a civil penalty in the amount of twelve thousand five hundred dollars ($12,500) from CFL. While the total dollar amount involved in the violations is not small, the amount involved in each violation is generally low. Additionally, many of the violations are based on the same sets of circumstances.

18/ The definition of "contribution" includes the term "advance". 2 U.S.C. § 431(8). The advances, for the most part, consisted of expenses of travel, lodging and subsistence made by individuals for the use of other CFL representatives and the candidate; consequently, the exclusion contained in former 2 U.S.C. § 431(e)(5)(D) does not apply. That section only exempted one's own expenses for travel. See 11 C.F.R. § 100.7(b)(8), former 11 C.F.R. § 100.4(b)(6).

IV. MISCELLANEOUS

A) MUR 1186 -- Felice Gelman Violation

There is no evidence indicating that Felice Gelman actually knew that Harold Harper had not contributed $40 to CFL. Her part in the submission of that contribution arose after the purported money order contribution was sent to CFL. She had no contact with Harper and there is no evidence that Martin Simon told her Harper had not made a $40 money order contribution. In light of those facts, it would be extremely difficult to prove a knowing and willful violation of 26 U.S.C. § 9042(c)(1)(A) by Ms. Gelman. Consequently, the Office of General Counsel recommends that the Commission take no further action, close the file with respect to Ms. Gelman and notify her of that determination.

B) MUR 1253 - Excessive Contributions by the Individual Respondents

2 U.S.C. § 441a(a)(1)(A) places an aggregate ceiling of $1,000 on individual contributions "to any candidate and his authorized political committees with respect to any election for Federal office."

While the eight individuals who are respondents in this matter appear to have violated the above-cited section of the Act by virtue of their excessive advances on behalf of CFL, based on past Commission action (see MUR 1349), the General Counsel is recommending that the Commission take no further action and close the file with respect to each of these eight individuals, and notify them of that decision.

C) MUR 1374 - Knowing and Willful Violations

As was discussed in the original General Counsel's Report dated June 10, 1981, the evidence in this matter is purely circumstantial. On analyzing CFL's recent response in this matter (see attachment 1), it is apparent that there is no direct evidence of a knowing and willful violation. The Committee has offered as an explanation that the circumstances of this matter involve "bookkeeping errors . . . mutually discovered by the FEC Audit Division and CFL." Such an explanation is in keeping with the General Counsel's original theory of the case, as suggested by the June 10, 1981, General Counsel Report. Moreover, on

December 12, 1982, CFL repaid the matching funds in question. Nothing found in the investigation suggests a "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act," the standard applied for a knowing and willful violation in American Federation of Labor and Congress of Industrial Organizations v. FEC, 628 F.2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 982 (1980).

Therefore, the Office of General Counsel recommends that the Commission take no further action in this matter, close the file and notify counsel for the respondent of that decision.

Recommendation

1)

2)

3) Take no further action in MUR 1186 with respect to Felice Gelman, and close the file as it pertains to her.

4) Take no further action in MUR 1253 with respect to: Rochelle Ascher; Elliott Eisenberg; Jeffrey Forrest; Lawrence Gray; Marjorie Mazel Hecht; Andrew Wilson; Donald J. Carr; and Ellen G. Scott, and close the file as it pertains to each.

5) Take no further action in MUR 1374 and close the file.

6) Approve the attached letters.

Attachments:

I. CFL's Response in MUR 1374.

II.

III. Proposed Letter to Felice Gelman's Counsel Concerning MUR 1186.

IV-XII. Proposed Letters to Individual Respondents in MUR 1253.

XIII. Proposed Letter to CFL's Counsel Concerning MUR 1374.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Gregory J. Perrin, Esq.
233 Broadway
New York, New York 10007

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

On March 27, 1980, the Commission found reason to believe that your client, Felice Gelman, had violated 26 U.S.C. § 9042(c)(1)(A), a provision of Chapters 95 and 96 of Title 26, U.S. Code in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close the file as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Lois Lerner, attorney in charge of the matter, at (202) 523-4175.

Sincerely,

Charles N. Steele

By: _____
Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mrs. Ellen G. Scott
P.O. Box 48
Fort Edward, N.Y. 12828

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jeffrey Forrest
217 Haven Ave.
New York, N.Y. 10033

RE: MUR 1253
Jeffrey Forrest

Dear Mr. Forrest:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Andrew Wilson
145 Peachtree Park Drive
Atlanta, Georgia 30309

RE: MUR 1253
Andrew Wilson

Dear Mr. Wilson:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Marjorie Mazel Hecht
251 West 87 Street
New York, N.Y. 10024

RE: MUR 1253
Marjorie Mazel Hecht

Dear Ms. Hecht:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Donald J. Carr
6730 Alexander
Saint Louis, MO. 63116

RE: MUR 1253
Donald J. Carr

Dear Mr. Carr:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lawrence Gray
200 East 27th Street
New York, N.Y. 10016

RE: MUR 1253
Lawrence Gray

Dear Mr. Gray:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT IX 1 of 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Elliot Eisenberg
5611 N. Glenwood
Chicago, Illinois 60660

RE: MUR 1253
Elliot Eisenberg

Dear Mr. Eisenberg:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Rochelle Ascher
461 Westover Hills Blvd.
Richmond, Virginia 23225

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 44la(a)(l)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT XI 1 of 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Rochelle Ascher
461 Westover Hills Blvd.
Richmond, Virginia 23225

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

After considering the circumstances of this matter, the Commission on August , 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that the making of excessive contributions by loans or otherwise nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT XII 1 of 1

GCC #7988

82 JUN22 P2:05

1

June 7, 1982

82 JUN22 P4:50

Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Attention: Office of General Counsel
Kenneth A. Gross, Esq.

Re: MUR 1374

Dear Mr. Gross:

Pursuant to your letter dated May 28, 1982 concerning the above referenced MUR:

1. Citizens for LaRouche denies that there was any knowing or willful violation of 26 U.S.C. 9042 (c)(1)(A) in this matter by CFL or any "agent" of CFL.

2. The circumstances of the bookkeeping errors which led to this matter were fully disclosed to the Audit Divison when the errors were mutually discovered by the FEC Audit Divison and CFL.

3. CFL repaid the monies to the Treasury which are at issue here.

4. Citizens for LaRouche does not believe that allegations of criminal violations of the FECA and FEC investigations should or can be premised on such investigative fancies as are stated in the factual and legal analysis to this MUR, namely:

> "the circumstantial evidence would suggest that Committee agents who submitted the matching funds request knew that the two individuals had been reimbursed for their contributions. It may be possible that such knowledge can be imputed to those persons."

The FEC knows that when this error was discovered, CFL acknowledged it as error and provided an explication to the auditors and repaid the Treasury monies.

Very truly yours,

MAYER MORGANROTH
24901 Northwestern Highway
Southfield, Michigan 48075

ATTACHMENT I 1 of 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mayer Morganroth, Esquire
24901 Northwestern Highway
Southfield, Michigan 48075

RE: MUR 1374
Citizens for LaRouche

Dear Mr. Morganroth:

On August , 1982, the Commission decided to take no further action in this matter. The entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Mayer Morganroth

Attorney at Law

Telephone (313) 355-3084
TWX 8102244558 Morganroth Sofd

555
Suite 344 Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075

RECEIVED
FEC
82 AUG 5 P1:57

AUG 5 P3:45

July 29, 1982

Mr. Larry Noble, Esq.
Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Re: Dolbeare v. F.E.C.
and Citizens for LaRouche
MURS.

Dear Mr. Noble:

I have previously sent you a letter offering certain performances to resolve the outstanding MURS and to bring to a close all the questioned items regarding CFL.

Please be advised that I reiterate that offer and would be pleased to enter into informal conciliation and upon its conclusion, dismiss all litigation as set forth in my previous letter of May 4, 1982.

Very truly yours,

Mayer Morganroth

MM/be

Mayer Morganroth
Attorney at Law
Suite 344 Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075

555

RECEIVED
FEC
02 AUG [illegible] 57

Mr. Larry Noble, Esq.
Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

8 3 1 1 0 3 6 7

RECEIVED
Ccch 8153
82 JUL23 P2:15
82 JUL23 P3:41

In the
FEDERAL ELECTION COMMISSION

In the Matter of:

Any and all M.U.R.S., audits, cases and controversies pending before this Commission involving Citizens for LaRouche, its officers or agents,

Please take Notice that the undersigned will terminate our employment as counsel for Citizens for LaRouche and its officers and agents in all matters pending before the Federal Election Commission effective July 30, 1982.

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

Dated: 14 July 1982

7 1 0 3 3 7 1 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1982

George B.P. Ward, Jr.
Maryland National Bank
P.O. Box 987
Baltimore, MD 21203

Re: MUR 1158 - Debra Freeman
Bank Records

Dear Mr. Ward:

During your June 7, 1982 conversation with Marsha Gentner and Lois Lerner you indicated that you had certain bank records of Debra Freeman's which had been subpoenaed by the Federal Election Commission, but which had never been picked up by Commission staff. We would appreciate it if you would send those records to us at this time. We will, of course, reimburse the bank for the reasonable cost of duplicating the records.

If you have any questions concerning this matter, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Lawrence M. Noble
Assistant General Counsel

MITCHELL & LEE, P.A.
Attorneys and Counsellors at Law
The Charles Building
2105 North Charles Street
Baltimore, Maryland 21218

RECEIVED
82 MAY 13 P1:04

Lawrence M. Noble, Esqure
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

8 3 0 4 1 0 3 7 7

5B Gcc# 7975

maryland national bank
BALTIMORE, MARYLAND 21203

WRITER'S DIRECT DIAL NUMBER

June 18, 1982

2 JUN 22 P12:36

Ms. Marsha G. Gentner, Attorney
Federal Election Commission
Washington D.C. 20463

Re: Debra Hanania Freeman

Dear Ms. Gentner:

In response to your letter of June 16th I am enclosing a copy of Ms. Freeman's letter to me dated September 18, 1981.

Sincerely yours,

George B. P. Ward, Jr.
Vice President

GBPW:cdg

7 1 7 5 - 3 5 0 0

COPY

Debra Hanania-Freeman
4004 Linkwood Road
Baltimore, Maryland 21210

September 18, 1981

George B. P. Ward, Jr. Esp.
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Dear Mr. Ward:

It is my understanding, from my previous conversation with you as well as from court records, that you, on behalf of Maryland National Bank handed over certain information concerning my personal bank accounts to the Federal Election Commission.

I was never notified by the bank or anyone else for that matter that this was taking place. Nor have I ever received copies of precisely what it was that you handed over to the Federal Election. I believe that a violation of the Right to Financial Privacy Act may have occurred along the line.

In any case, I am requesting here that you forward to me immediately copies of any and all information from my personal bank accounts or any other accounts in my name that you furnished the Federal Election Commission with.

I expect you to give this matter your prompt attention.

Sincerely,

Debra Hanania-Freeman

Debra Hanania-Freeman

GCC# 1975

maryland national
bank
BALTIMORE, MARYLAND 21203

WRITER'S DIRECT DIAL NUMBER

June 18, 1982

82 JUN 22 PM 12:36

Ms. Marsha G. Gentner, Attorney
Federal Election Commission
Washington D.C. 20463

Re: Debra Hanania Freeman

Dear Ms. Gentner:

In response to your letter of June 16th I am enclosing a copy of Ms. Freeman's letter to me dated September 18, 1981.

Sincerely yours,

George B. P. Ward, Jr.
Vice President

GBPW:cdg

COPY

Debra Hanania-Freeman
4004 Linkwood Road
Baltimore, Maryland 21210

September 18, 1981

George B. P. Ward, Jr. Esp.
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Dear Mr. Ward:

It is my understanding, from my previous conversation with you as well as from court records, that you, on behalf of Maryland National Bank handed over certain information concerning my personal bank accounts to the Federal Election Commission.

I was never notified by the bank or anyone else for that matter that this was taking place. Nor have I ever received copies of precisely what it was that you handed over to the Federal Election. I believe that a violation of the Right to Financial Privacy Act may have occurred along the line.

In any case, I am requesting here that you forward to me immediately copies of any and all information from my personal bank accounts or any other accounts in my name that you furnished the Federal Election Commission with.

I expect you to give this matter your prompt attention.

Sincerely,

Debra Hanania-Freeman

Debra Hanania-Freeman

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1982

George B.P. Ward, Jr.
Maryland National Bank
P.O. Box 987
Baltimore, MD 21203

Dear Mr. Ward:

Thank-you for sending me copies of your letters to Debra Freeman in connection with the Commission's subpoena of the records of her accounts at Maryland National Bank. I received those materials today; however, you did not include a copy of Ms. Freeman's October 1981 letter to you, which I had also requested. If you have no problem with providing a copy of that letter, I would appreciate it if you would send it to me, at your convenience.

Thank-you again.

Sincerely,

Marsha G. Gentner
Attorney

MARYLAND NATIONAL BANK
BALTIMORE, MD.

October 21, 1981

Ms. Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

In response to your letter of September 18, 1981 my records do not indicate that copies of any of your bank account records were turned over to the Federal Election Commission because the person handling the case for the Commission never showed up to pick them up as was agreed.

Nevertheless, in reliance on the subpoenas issued by the Commission as modified by Judge Kaufman's order and the certificates of compliance with the Right to Financial Privacy also issued by the Commission, I would have turned over the material requested if the matter had been pursued and I will turn it over if it is pursued.

Very truly yours,

George B. P. Ward, Jr.
Vice President

GBPWjr:cdg

COPY

82 JUN 15 P2:13
GENERAL COUNSEL

June 14, 1982

Ms. Debra Banania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

This letter is intended to correct any inaccurate information which may have been conveyed to you by my letter of October 21, 1981.

In response to a subpoena for bank records issued by the Federal Election Commission dated March 27, 1980 as modified by the terms of Judge Kaufman's order of May 8, 1980 and in reliance on the certificate of compliance with the Right to Privacy Act of 1978 dated June 11, 1980, the following records of your accounts were turned over to the Commission on June 19, 1980:

n/o Debra J. Banania
- Signature card
- Statements for the period January 11, 1979 through April 9, 1980

n/o Debra J. Banania
- Signature card
- Transaction history for the period January 19, 1979 through March 31, 1980
- Withdrawal slip dated January 14, 1980 in the amount of $750.00

Although additional records were initially requested, none were turned over to the Commission because the staff member who was handling the matter for the Commission never came to pick them up as agreed.

I trust this will clear up any misunderstanding.

Very truly yours,

GBPWJr

George B. P. Ward, Jr.
Vice President

GBPW:cdg

bcc: Ms. Marsha G. Gentner, Attorney
Federal Election Commission
Washington D.C. 20463

MUR 1777

MCC # 7954

maryland national bank
BALTIMORE, MARYLAND 21203

WRITER'S DIRECT DIAL NUMBER

June 14, 1982

82 JUN 15 P2:05

Ms. Marsha G. Gentner, Attorney
Federal Election Commission
Washington D.C. 20463

Re: Debra Hanania Freeman

Dear Ms. Gentner:

In response to your letter of June 8th I am enclosing a copy of my letter to Ms. Freeman dated October 21, 1981 as well as a copy of my letter of June 14, 1982.

Sincerely yours,

George B. P. Ward, Jr.
Vice President

GBPW:cdg

1158

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1982

George B.P. Ward, Jr.
Maryland National Bank
P.O. Box 987
Baltimore, MD 21203

Dear Mr. Ward:

Pursuant to our telephone conversation of June 7, 1982, enclosed please find a copy of the transcript of your deposition taken on June 19, 1980, the exhibits thereto, and copies of the documents with respect to Debra Freeman's account that you produced for the Commission at your deposition. Should Ms. Freeman renew her request for copies of these documents, the Commission has no objection to the bank processing that request in the way such requests are normally handled by Maryland National Bank. I do want to point out, however, that the documents which represent copies of Maryland National Bank cashier's check number 3441224, appear to be MNB records rather than customer (Ms. Freeman's) records, as that term is defined by the Bank Privacy Act.

In light of the contents of Ms. Freeman's October 1981 letter to you seeking copies of the records produced by the bank to the FEC, I would also appreciate it if you would send me a copy of that letter so that my files on this matter will be complete. In addition, should Ms. Freeman initiate any claim against you or Maryland National Bank, pursuant to the Bank Privacy Act, I would appreciate it if you would notify me immediately.

Thank-you again for your attention to this matter. If you have any questions or problems concerning the above, please do not hesitate to call me, at (202) 523-4175.

Sincerely,

Marsha G. Gentner

Marsha G. Gentner
Attorney

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

David B. Mitchell, Esquire
Mitchell & Lee, P.A.
2105 North Charles Street
Baltimore, Maryland 21218

Re: MUR 1158

Dear Mr. Mitchell:

Enclosed is a copy of the court's opinion and order in Dolbeare v. Federal Election Comm'n., to which I referred in my April 15, 1982 letter to you. Please excuse our oversight in not attaching it to that letter.

If you have any other questions or problems please contact Lois Lerner, the attorney in charge of this matter, at (202) 523-4175.

Sincerely,

Lawrence M. Noble
Assistant General Counsel

Enclosure

1158 7

20467 RECEIVED Ccc# 7731

82 MAY 13 P 1:04

MITCHELL & LEE, P.A.
Attorneys and Counsellors at Law
The Charles Building
2105 North Charles Street
Baltimore, Maryland 21218

David B. Mitchell
Charles Curtis Lee
(1945-1978)

Robert L. Bloom
Elizabeth L. Julian*

*Admitted in Pa. also

Area Code 301
837-5559

May 10, 1982

82 MAY 13 P2:39

Lawrence M. Noble, Esquire
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1158

Dear Mr. Noble:

I wish to acknowledge your letter of April 27, 1982 regarding the FEC's desire to depose Mr. Warm and Ms. de Grazia. You referred to an apparently unreported decision by a Federal Court that upheld the Commission's right to continue its suspended depositions. I am not privy to that decision. Please provide me with a copy of the matter of Dolbeare v. Fed. Election Comm'n as mentioned in the copy of your April 15, 1982 letter attached to that of April 27, 1982.

Your notice of deposition has been sent on to the deponents with the request that they contact me. I will advise you in a timely fashion whether I will be representing each of them.

Very truly yours,

MITCHELL AND LEE, P.A.

DAVID B. MITCHELL

DBM:dag

cc: Mr. Lawrence Freeman

MUR 1158

STIPULATION FOR SUBSTITUTION OF ATTORNEYS

IT IS HEREBY STIPULATED AND AGREED THAT Mayer Morganroth, Esq. of 24901 Northwestern Highway, Detroit, Michigan be and he hereby is substituted as attorney in the place and stead of David Mitchell, Esq. of 2105 North Charles Street, Baltimore, Maryland for the following witnesses in a Federal Election Commission investigation of Debra Freeman and Citizens for LaRouche, Inc.:

STEVEN WARM

BELINDA DEGRAZIA

ROBERT ROBINSON, M.D.

Dated: June , 1982

DAVID MITCHELL

MAYER MORGANROTH

2 0 4 0 3 7 1 8

GCC #7857

MAY 26, 1982

Federal Election Commission
1325 K ST NW
WASHINGTON, D.C.

RE: FEC MURS, CITIZENS for LAROUCHE.

LADIES And GENTLEMEN:

THIS is to notify you that MAYER MORGANROTH, ESQ. is an attorney for Citizens for LAROUCHE and represents Citizens for LAROUCHE in ENFORCEMENT MATTERS CURRENTLY pending before the FEC.

Very Truly yours,

Patricia Dolbeare Salisbury
Treasurer

May 7, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kaysen

SUBJECT: MURs 1158, 1186, 1352

Please have the attached Comprehensive Investigative Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

cc: Lerner

9 0 1 7 1 0

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

82 MAY 7 A 9:10

In the Matter of) MURS 1158, 1186, 1352
)
Citizens for LaRouche)

COMPREHENSIVE INVESTIGATIVE REPORT

I. BACKGROUND

On December 18, 1979, the Commission qualified Citizens for LaRouche (CFL) to receive matching funds for the 1980 presidential primary campaign. During audits conducted pursuant to that qualification, certain irregularities were noted in the documentation submitted by CFL. The Commission undertook investigations into those irregularities which are summarized as follows:

A. MUR 1158

This matter arose during a review of CFL's third matching fund submission. Auditors discovered that several money orders submitted for matching funds contained signatures patently dissimilar from signatures found on other instruments purportedly signed by the same individuals. Many of the signatures on the instruments bore a strong resemblance to handwriting on checks contributed by Debra Hanania Freeman, CFL Committee Representative for Baltimore. An additional irregularity appeared on a cashier's check purportedly contributed by Dr. Harold Harrison. The check contained the notation:

> CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)

The notation appears to have been typed by two different typewriters; the added words implying that Harrison, rather than Freeman, requested the check. The signature card submitted as documentation for the contribution listed an address for Harold H. Harrison, M.D., however, no one by that name was found at that address. Furthermore, the signature on Harrison's signature card closely resembled the signature on an contribution check attributed to another individual.

On February 12, 1980, the Commission found reason to believe that Debra Hanania Freeman had violated 26 U.S.C. § 9042(C)(1) and 2 U.S.C. § 441f with respect to the above-described instruments. The Commission authorized the taking of eight depositions and, on February 2, 1981, based on those depositions found reason to believe that CFL had violated 2 U.S.C. §§ 441f

and 441g,1/ 11 C.F.R. § 9042(c). Eighteen additional depositions were authorized, three of which have been taken and four others are awaiting scheduling. Attempts to locate the remaining individuals involved have been unsuccessful.

The following summarizes the testimony taken in Baltimore:2/

1) Reverend William Hayden was shown a $35 money order made out to CFL with his name and address printed on the sender line. He said he had never seen the money order nor had he ever contributed anything to CFL. He said he had given $35 cash to Robert Primack for an annual membership in the National Anti-Drug Coalition (NADC) Conference. He has not seen or heard from Primack since then.

2) Ernest K. Pulsifer testified that Lawrence Freeman had solicited him by telephone in late 1979. He met with Freeman and his wife Debra, and discussed LaRouche's campaign. He then went to CFL campaign headquarters and gave a $100 cash contribution to Mr. Freeman. Pulsifer gave cash contributions to Lawrence Freeman on two other occasions; one for $40 and one for $150. When shown a $150 money order ostensibly signed by him, Pulsifer denied ever having seen it before and pointed out that his name was spelled incorrectly on the money order.

3) Nancy Radcliffe testified that she was a CFL volunteer for the 1980 campaign. She admitted making a $250 cash contribution to CFL which she gave to Debra Freeman. When shown a $250 money order purportedly signed by her, Radcliffe denied purchasing it or signing it and noted that her name was spelled incorrectly on the money order. Radcliffe said that Debra Freeman had purchased it and that she (Radcliffe) had seen the completed

---

1/ This appears to be an error as 2 U.S.C. § 441g applies to people who contribute over $100 in cash. CFL did not make cash contributions, rather it received them. Therefore, 11 C.F.R. § 110.4(C)(2) is more appropriately applied here.

2/ See Attachment A for a summary in chart form.

money order among a group of other contributions being sent to the CFL office in New York. Radcliffe then produced a document in which she had acknowledged making a $250 contribution to CFL on 9/10/79.3/ She indicated that Debra Freeman had asked her to sign the document on 2/28/80. Although Radcliffe stated that she had seen Freeman regularly during the period between 9/10/79 and 2/28/80, she could offer no explanation why Freeman had waited six months to have her acknowledge the contribution.4/

Radcliffe was also asked about two personal checks she had contributed. The name Robert Primack was imprinted on the checks, while Radcliffe's name was added with a pen. She indicated that it was a joint checking account, but was unwilling to provide any information concerning Primack. (This is the same Robert Primack referred to by Rev. William Hayden. See 1, supra. Efforts to locate Primack have failed.)

4) Dr. Robert A. Robinson stated that he had contributed checks to CFL, but never money orders. When shown a $250 money order signed Robert A. Robinson, he stated that it was not his signature nor did it appear to be that of his son, Robert A. Robinson, Jr., who had once lived at the address shown on the money order. Dr. Robinson was then shown another $250 money order with the name Robert A. Robinson, Jr. printed on the signature line. Dr. Robinson did not recognize the printing on the money order and pointed out that the house number on the address was different from the number on the previous money order.

5) Kevin Salisbury stated that he had contributed to LaRouche, but could not recall how much or whether the contributions were by cash or check. He did recall that he had given the contributions to Debra Freeman. When shown a $140 money signed "Kevin Salisbury" he could not recall whether he had purchased it or had ever seen it. He did testify that the signature was not his. Salisbury was

---

3/ This document was not in the Commission's files.

4/ It is noteworthy that 2/28/80, the date of the acknowledgement is only nine days after Freeman was notified of the Commission's reason to believe finding against her.

uncooperative when asked about the circumstances surrounding the purchase of a $450 money order, but did state that none of the printing on it was his. He pointed out that the letters t and p in the word "apt." in the address were transposed. An acknowledgement card admittedly signed by Salisbury contained the same mistake, leading to the conclusion that the money order was filled out by someone after the acknowledgement was signed.

6) Charles Clark's testimony was confusing, however, he seemed to indicate that he had purchased tickets to LaRouche fundraisers on three occasions. The tickets cost $25, $20 and $15, but it appears as though Clark paid for them in installments by giving $5-$10 at a time to Debra Freeman or Steve Warm. It was Warm who asked him to sign an acknowledgement that he had contributed $70 to CFL. It was Warm who told him that his contributions totalled $70. When shown the $70 money order in his name, Clark said he had never contributed a money order nor had he made a single $70 contribution.

7) Ann A. Taylor - When shown a money order for $150 containing her address and signed "Anne R. Taylor", Ms. Taylor stated that she had never purchased a money order in her life nor had she ever contributed to CFL. In addition, she noted that the spelling of her first name was incorrect and the middle initial in the signature was different than hers.

8) David Sanders denied purchasing or signing both a $45 and a $25 money order purportedly signed by him. He said he had given cash contributions to CFL and assumed that they were turned into money orders so they could be sent through the mail, but he never instructed anyone to purchase the money orders for him. Sanders was shown one of two signed acknowldgements submitted to the Commission which stated that he had contributed a $45 money order to CFL. He testified that the signature on it was not his. (Sanders was not shown the second acknowledgement.) Sanders was also asked about a $1,009.58 check from Household Finance made out to him and endorsed over to CFL. He stated that he had obtained a personal loan to buy furniture, but decided to give the money to CFL instead. He was then shown an acknowledgement of that contribution signed by David Sanders and by Lenor Sanders as his spouse. Sanders indicated that he did not

know a Lenore Sanders. His wife's name is Diana Sayoun. He could not recall whether the Lenore Sanders signature had appeared on the acknowledgement when he signed it.5/ He also testified that the $1,009.58 contribution was his alone, and that he was never told by anyone at CFL that it was illegal to contribute over $1,000 to one campaign.

9) Diana Sayoun was shown the acknowledgement document containing the name Lenore Sanders. Sayoun stated that she did not sign it, she had never used the name Lenore Sanders and she did not know Lenore Sanders. She did state that she had once received a letter from the U.S. Labor Party addressed to Lenore Sanders. Sayoun said that someone from the U.S. Labor had tried to get her to sign a contribution acknowledgement, but she refused because she had never contributed. She said her husband had told her that the $1,009.58 check was a loan to the U.S. Labor Party which they repaid in monthly installments. However, she indicated that she did not believe him, but felt that he had told her that story so she would not be angry with him because he had contributed such a large amount to the U.S. Labor Party.

10) George B. P. Ward, Jr., vice president for the Maryland National Bank testified concerning the bank records of Debra Hanania Freeman. The records were subpoenaed in an effort to learn more about the earlier described $250 cashier's check ostensibly contributed by Dr. Harold H. Harrison.6/ Those records indicated that Debra Freeman had withdrawn $750 from her account and used $250 of that money to purchase the cashier's check. The bank copy of the check contained only the notation typed "CUSTOMER REQUEST BY: DEBRA HANANIA FREEMAN" indicating the other information was added after the purchase.

5/ Sanders was a difficult witness. Even after he testified that his wife's name is Diana Sayoun, he would not state that the "Lenore Sanders" appearing on the acknowledgment was not his wife's signature.

6/ No Dr. Harold H. Harrison was ever located. The only Dr. Harold Harrison listed in Baltimore is Dr. Harold E. Harrison, who, by interrogatory, denied ever contributing to CFL.

11) Debra Hanania Freeman testified that she sometimes purchased money orders for people who made cash contributions, but only after the contributor had consented to the purchase and filled out an acknowledgement. When asked why many acknowledgements were dated long after the money orders, she said sometimes the people in CFL's New York Office called to say they needed an acknowledgement for someone because they had lost one or had none on file and were about the make a submission. She also testified that other volunteers sometimes gave her cash which they had collected and asked her to buy money orders for the contributors. She testified that she understood she could fill out the money orders as long as the contributors signed contribution acknowledgements.7/ Freeman admitted purchasing the Harold Harrison cashier's check. She said "someone" had given her a pledge envelope with Harrison's $250 in it and asked her to buy a money order with it. She took the money to her bank and obtained a cashier's check instead because her bank provided free cashier's checks to its customers. She did not explain why she had purchased money orders on all other occasions, nor did she indicate that she had withdrawn the money for the cashier's check from her account. When asked about the typed notation on the check, Freeman said the additional typing was not on the check when she submitted it to CFL in New York.

Freeman was asked to provide handwritting exemplars for all questioned documents. Although she provided some, her attorney advised her not to continue with them absent a court order.

B. MUR 1186

During their review of threshold submissions the auditors found twelve money orders, each listing a name and an Oregon address, but each failing either to contain the requisite signature or to be accompanied by a signed acknowledgement document. On Friday, December 7, 1979, Felice Gelman of CFL was informed that the signatures were required in order for the

---

7/ Freeman indicated that she received her instructions concerning contributions from the New York Office of CFL, through Felice Gelman.

contributions to be matchable.8/ Three days later CFL submitted the twelve acknowledgement documents. Because the speed with which the documents were obtained raised questions concerning their legitimacy, confirmation letters were sent out in an effort to verify them.

Of the six responses received, five verified their contributions. The sixth letter came from Harold Harper who indicated that he had purchased a subscription to "their" (CFL) newspaper for $20 per year and two copies of "their" book, Dope, Inc. for $5 per copy, however, he did not consider those payments to be contributions. In addition, Harper stated that he had paid for all items by cash, not money order. The information provided by Harper differed from that submitted by CFL in three significant respects: the amount paid ($30 vs. $40); the method of payment (cash vs. money order); and the purpose of the payments (purchases vs. contributions). Based on that conflicting information, the Commission found reason to believe that CFL and Felice Gelman knowingly and willfully submitted false information to the Commission in violation of 26 U.S.C. § 9042(c). Interrogatories were sent to CFL requesting the name of the CFL representative in Oregon who had submitted the Harper money order. Subpoenas for depositions were then issued to the six people who had not responded to the confirmation letters, to Felice Gelman and to Martin Simon, the identified submittor of the Harper money order. All but Gelman and one "contributor" were deposed.

Those deposed indicated that they had either purchased the money orders in question or given Martin Simon cash and authorized9/ him to purchase money orders for them. In some cases Simon returned with the money orders and the contributors filled them out, while in others Simon presumably filled out the money orders. All contributors stated that Simon requested them to sign a document acknowledging their contributions. Each of those documents listed the dates and the amounts of the contributions, and specified "money order" as the method of payment. In all cases, the contributors acknowledged their contributions.

8/ If the contributions had been found to be unmatchable, CFL would have failed to meet the eligibility requirements for matching fund payments.

9/ It should be noted that in one case the "authorization" was more understood than specified. (For example - Robert Musmansky)

Martin Simon testified that he was a full time volunteer for CFL and was the coordinator for Oregon fundraising. He stated that inasmuch as the national strategy of CFL was to qualify for matching funds, he discouraged cash contributions. He explained to contributors the matchability requirement of a written instrument and either went with them to buy a money order or secured one for them. Simon was able to obtain money orders at no cost at his bank. If he obtained the money order, he made a copy of the receipt for his records and sent a copy to the contributor. Simon indicated that he was not aware of the signature requirement until CFL notified him that the money orders in question had been rejected for matchability. Simon also testified that he kept a separate accounting of cash receipts whether they be contributions or payments for literature. Such amounts were sent to New York via an all inclusive money order containing an explanatory notation.

When questioned concerning Harold Harper, Simon indicated that Harper had made one $40 cash contribution in 1979. Harper originally told Simon that he would have his wife make out a check and mail it. When Simon did not receive it, he contacted Harper who said that the check had been sent. He added that he would have the post office trace it. Harper then told Simon to come to his place of business and he would give him another check. When Simon arrived Harper had forgotten his checkbook so he gave him the $40 cash. Simon obtained a $40 money order and sent Harper a copy.10/

Harper's description of the situation is quite different. In a sworn affidavit he indicated that he had been solicited by CFL for contributions several times, but always refused to contribute. In the fall of 1978 he purchased a subscription to "their" paper, New Solidarity, at a cost of $20 for the year. He did this in order to learn more about LaRouche, not to contribute to his campaign. He paid for the subscription in cash. When the subscription expired Harper told Martin Simon he wished to renew it and sent Simon a money order for $20. Harper was certain that he never told Simon that he was making a "contribution", nor did he say he would have his wife send Simon a check. The $20 money order was lost in the mail and, at Simon's request, Harper paid him for the subscription in cash. Harper also stated that he had purchased two copies of Dope, Inc. at $5 per copy and had paid Simon $10 in cash for the books. He did not intend the $10 as a contribution. Harper admitted that he had signed the acknowledgement document, but only after CFL representatives

---

10/ This version of what occurred is strikingly similar to Simon's version of what occurred with contributor Richard Wise. (Simon deposition p. 38) Wise confirmed his money order contribution.

bothered him at work while he was very busy. He signed the acknowledgement without reading it, or knowing what it would be used for.

Finally, Harper emphasized that he had never purchased a $40 money order or sent one to CFL, nor had he authorized anyone to purchase or send one for him. He had never been shown the money order which was submitted in his name, nor had he received a copy of it.

C. MUR 1352

This matter concerns three patterns of irregularities discovered by the Audit Division during its review of CFL's records pursuant to 26 U.S.C. § 9038. The initial pattern noted involved a large number of money orders issued from two Chicago banking entities and deposited in CFL's New York headquarters between December 10 and 17, 1979. The serial numbers and dates on these money orders indicate that many were consecutively numbered and had been purchased on the same date. A total of thirty-one money orders received from twenty-three contributors were reviewed.[11] Many of the money orders purportedly contributed by the same individuals contained patently different signatures.[12] In addition, the payee line of most of the instruments appeared to be filled out by the same hand. The auditors also noted that twenty-one of the twenty-three contributors were listed as "unemployed."

The second pattern noted by the auditors concerned four money orders purchased from the Chase Manhatten Bank. The date and payee lines on all four instruments appeared to have been filled out by the same hand.

Finally, the auditors found three consecutively numbered $200 money orders issued by the Bank of New York. One of the three, purportedly signed by CFL volunteer Joyce Rubinstein, appeared to have been filled out by the same hand as the four purchased at the Chase Manhattan Bank.

On August 7, 1980, pursuant to 26 U.S.C. § 9039, the Commission authorized the taking of twenty-three depositions in the matter, however, United States Marshals were only able to serve eleven of the individuals, nine of whom were deposed. On October 24, 1980, the United States District Court for the District of Columbia found that the Commission did not have jurisdiction to pursue the matter under 26 U.S.C. § 9039. (Gelman v. Fed. Election Comm'n.) Consequently, on March 16, 1981, pursuant to 2 U.S.C. § 437(g), the Commission found reason to believe that CFL knowingly and willfully submitted false

---

11/ Twenty-three of these were submitted for matching funds.

12/ Seven of the people involved are known LaRouche volunteers.

information to the Commission, in violation of 26 U.S.C. § 9042(c). Authorization was given for the taking of seventeen depositions, however, only two of the individuals have been served thus far.13/

Of the nine individuals deposed in Chicago, eight testified that they had been unemployed for the last year, during which time they had volunteered for CFL.14/ When confronted with money orders ostensibly signed by them, the volunteers responded as follows:15/

1) Robert Hart, Janice Hart and Paul Greenberg denied ever purchasing or signing the money orders and stated that they "could not recall" making contributions in the amounts shown on the money orders;

2) Sander Peretz Fredman testified that he had purchased money orders for himself and, at the instruction of Elliot Eisenberg,16/ had also purchased other money orders. When faced with three consecutively numbered money orders containing the signature "Sherri Waffle", Fredman testified that he "might" have purchased and signed them for his friend Ms. Waffle.

3) Victoria Lacy trestified that she had made three contributions to CFL: a $100 check; a $100 money order; and a $50 money order. She admitted signing the $50 and $100 money orders shown to her, but said someone at CFL had purchased them. She "could not recall "whether she had paid for them before or after they were purchased and stated that many people at CFL were involved in purchasing money orders. Lacy also

---

13/ All efforts to serve the others, including the use of Pinkerton Agents, have failed.

14/ These people testified that they had received some living expenses from CFL so that they could continue to "volunteer." In addition, several testified they had worked for the National Anti-Drug Coalition (NADC) which shared office space with CFL. NADC is a LaRouche related organization. (See William Hayden testimony, supra, p. 3.)

15/ See Attachment B for a summary in chart form.

16/ Eisenberg's name surfaces throughout the depositions as the person who managed campaign financing. We have been unable to depose Eisenberg as he has evaded all efforts to serve him.

stated that December 10, 1979, the date on both her money orders, was the date of a big CFL fundraising event.17/ When shown a third money order purportedly signed by her, Lacy initially denied purchasing it, but later admitted both purchasing and signing it. Her description of the circumstances surrounding its purchase is questionable. She testified that she took the $250, which she had received as a gift from her parents with her to Lombard, a town 90 miles from Chicago on a day she was campaigning for contributions. She purchased the money order in Lombard rather than buying it in Chicago, but provided no explanation for doing so.

4) John Brown, Jr. testified that he made contributions to CFL by putting money in a slot in the "campaign desk" in the CFL office. He also put cash receipts from the sale of materials in or on that desk. Brown said he did not know who gathered the money or what happened to it after it was left in the desk. Brown admitted signing a $120 money order shown to him, but "did not know" whether he had purchased it or whether he had even contributed $120 to CFL.

5) Robert E. Pierce testified that he has purchased several money orders for CFL including one from a Missouri bank. Pierce said he gave these money orders to Elliot Eisenberg who oversaw Pierce's fundraising activities. Pierce stated that he put the contributions he had collected into the "fundraising desk". When shown a $100 money order with his name on it, Pierce admitted signing it, but said Gerald Pechenuk had purchased it. He "could not recall" whether he had instructed Pechenuk to do so.

6) Mitchell Hirsch stated that he had gone with other CFL members to purchase money orders, however, all money orders he purchased were for his own contributions. Hirsch recalled purchasing and signing both money orders attributed to him, but did not recall accompanying Gerald Pechenuk to purchase the 12/13/79 money order even though Pechenuk's 12/13/79 money order lists the next consecutive number to Hirsch's. Hirsch recalled soliciting a credit card contribution from William Lerch by telephone. He gave the credit card

---

17/ Sixteen of the twenty money orders discussed here are dated within three days of the 12/10/79 fundraiser. In addition, some consecutively numbered money orders contained dates several days apart leading to the conclusion that money orders may have been purchased in blocks and filled in as needed.

information Lerch provided to Elliot Eisenberg, but did not have any further information concerning the transaction.

The only non-volunteer deposed was William Lerch, the contributor solicited by Mitchell Hirsch. Lerch testified that he had charged two contributions on his credit card the first for $200, the second for $50. Both contributions were made by telephone. When shown the two money orders attributed to him, Lerch admitted signing the one for $200, but could not recall the circumstances of the signing. He stated that he had authorized the purchase of the money order by his telephone contribution. When shown the $55 money order, Lerch denied ever making a $55 contribution or signing the money order.

II. STATUS OF INVESTIGATIONS

On July 18, 1981, CFL filed a suit entitled Dolbeare v. Fed. Election Comm'n., No. 81 Civ. 4468, against the Commission in the Southern District of New York. CFL sought to preliminary and permanently enjoin the Commission from any further investigation into possible violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 et seq. (FECA), and the Presidential Election Campaign Fund Act, 26 U.S.C. § 9001 et seq. (Matching Payment Act), by CFL and CFL contributors. On September 3, 1981, argument was heard on CFL's motion for preliminary injunction. Upon learning, during that hearing, of the Commission's intention to file a motion to dismiss the action, the court strongly urged the parties to agree to a stipulation to maintain the status quo until the Commission's motion was ruled on. Argument was heard on the motion to dismiss on October 1, 1981, at which time the court ordered that the matters which were the subject of the stipulation continue to be stayed pending its decision on that motion.

On March 9, 1982 the district court issued a memorandum opinion denying the Commission's Motion to Dismiss. The same memorandum indicated that the judge would issue a preliminary injunction; contingent upon CFL's filing of a waiver of any claim that the statute of limitations or laches would ultimately bar any Commission action prohibited by the injunction order. On April 5, 1982, the court issued its injunction which permits the investigation into the above-discussed MURs to resume, pending a

trial on the merits of CFL's harrassment claims. The investigations are again underway.

May 6, 1982
Date

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Attachment A - Summary of MUR 1158 (2 pages)
2. Attachment B - Summary of MUR 1352 (2 pages)

2 0 1 0 3 7 1 0

WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/ DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGE-MENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
Rev. William Hayden	Money Order	signed	denied	$140	1/12/80	None submitted		Not asked
Ernest K. Pulsifer	Money Order	signed "Ernest" K. Pulsifor"	denied	$150	12/4/79	4/3/80	not shown to Pulsifer	She purchased money order with money Pulsifer gave her. Does not know if she signed.
Nancy Radcliffe	Money Order	signed "Nancy Radcliff_"	denied	$250	9/12/70	2/28/80 (not in Commission's files)	Radcliffe admits signature	She purchased, filled out and signed money order
Dr. Robert A. Robinson	Money Order	signed "Robert A. Robinson"	denied	$250	9/12/79	None Submitted		Not shown
" " "	Money Order	signed "Robert A. Robinson, Jr."	denied	$250	2/22/80	None submitted		Not shown
Kevin Salisbury	Money Order	signed	denied	$140	1/12/80	1/21/80	Salisbury admits signature	Does not recall filling out money order
" " "	Money Order	printed Kevin Salisbury	denied	$450	1/21/80	1/21/80	admits	Not shown
Charles Clark	Money Order	signed	denied	$70	11/13/79	2/21/80	Clark admits signature	She filled out and signed money order
Ann A. Taylor	Money Order	signed "Anne R. Taylor"	denied	$150	11/26/79	None submitted		Does not recall money order

ATTACHMENT A
MUR 1158

WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/ DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGE-MENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
Rev. William Hayden	Money Order	signed	denied	$140	1/12/80	None submitted		Not asked
Ernest K. Pulsifer	Money Order	signed "Ernest" K. Pulsifor"	denied	$150	12/4/79	4/3/80	not shown to Pulsifer	She purchased money order with money Pulsifer gave her. Does not know if she signed.
Nancy Radcliffe	Money Order	signed "Nancy Radcliff_"	denied	$250	9/12/70	2/28/80 (not in Commission's files)	Radclitfe admits signature	She purchased, filled out and signed money order
Dr. Robert A. Robinson	Money Order	signed "Robert A. Robinson"	denied	$250	9/12/79	None Submitted		Not shown
" " "	Money Order	signed "Robert A. Robinson, Jr."	denied	$250	2/22/80	None submitted		Not shown
Kevin Salisbury	Money Order	signed	denied	$140	1/12/80	1/21/80	Salisbury admits signature	Does not recall filling out money order
" " "	Money Order	printed Kevin Salisbury	denied	$450	1/21/80	1/21/80	admits	Not shown
Charles Clark	Money Order	signed	denied	$70	11/13/79	2/21/80	Clark admits signature	She filled out and signed money order
Ann A. Taylor	Money Order	signed "Anne R. Taylor"	denied	$150	11/26/79	None submitted		Does not recall money order

Attachment I (1)

WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/ DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGE-MENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
David Sanders	Money Order	signed	denied	$45	11/25/80	Two submitted a)12/28/79	a) Sander's denied signature, Freeman says only "sample" not sent to New York	She purchased and signed money order
						b) 2/23/80	b) Not shown to Sanders	
David Sanders	Money Order	signed	denied	$25	1/3/80	none		
David Sanders	HFC check	endorsed David Sanders	admitted	$1009.58	1/22/80	1/22/80	admits signing	was not present when it was signed printed the names below signatures
Diana Sayoun	"	"		"	"	1/22/80	denies signing "Lenore Sanders"	

Attachment I(2)

ATTACHMENT "A"
MUR 1352

NAME ON MONEY ORDER	INFORMATION CONCERNING PURCHASE	INFORMATION CONCERNING SIGNATURE	DATED	AMOUNT	BANK NAME	CHECK NUMBER
William Lerch	Lerch does not know who purchased it	Lerch admits his signature	11/19/79	$200	Continental Bank	
William Lerch	Lerch says he never made a $55 contribution	Lerch denies his signature	12/7/79	$ 55	Continental Bank	
Robert E. Pierce	Pierce says Gerald Pechenuk purchased it	Pierce admits signing it	11/23/79	$100	Amalgamated Trust	
Sherri Waffle	Sander Peretz Fredman said he probably brought it	Sander Peretz Fredman said he probably signed it	12/7/79	$135	Continental Bank	
Sherri Waffle	" " "	" " "	12/7/79	$ 85	Continental Bank	
Sherri Waffle	" " "	" " "	12/7/79	$ 80	Continental Bank	
Janice Hart	Janice Hart denied purchasing it	Janice Hart denied signing it	12/7/79	$125	Amalgamated Trust	
Janice Hart	" " "	" " "	12/7/79	$120	Amalgamated Trust	
Victoria Lacy	Lacy denies purchasing it. Indicated someone in office bought it and she paid for it.	Lacy admits signing it.	12/10/79	$100	Amalgamated Trust	
Victoria Lacy	Lacy can not recall who purchased it.	Lacy admits signing it.	12/10/79	$ 50	Amalgamated Trust	
Victoria Lacy	Lacy did not recall at first, but later admitted buying	Lacy admits signing it.	1/23/80	$250	West Suburban Bank	
Robert Hart	Hart denies purchasing it	Hart denies signing it	12/10/79	$250	Continental	

Attachment A (1)

NAME ON MONEY ORDER	INFORMATION CONCERNING PURCHASE	INFORMATION CONCERNING SIGNATURE	DATED	AMOUNT	BANK NAME	CHECK NUMBER
Paul Greenberg	Greenberg denies purchasing it	Greenberg denies signing it	12/10/79	$100	Continental Bank	
Paul Greenberg	" " "	" " "	12/11/79	$100	Amalgamated Trust	
Sander Peretz Fredman	Fredman does not recall purchasing it	Fredman say signature "looks like his" (won't positively ID)	12/11/79	$250	Merchant's Currency Exchange	
Mitchell Mirach	Mirach admits purchasing it	Mirach admits signing it	12/11/79	$250	ACME Currency Exchange	
Mitchell Mirach	" " "	" " "	12/11/79	$200	Continental Bank	
Gerald Pechenuk	No information	No information	12/13/79	$150	Continental Bank	
Ronald Bettang	No information	No information	12/13/79	$180	Continental Bank	
John H. Brown, Jr.	Brown does not recall purchasing it	Brown denies signing it	12/13/79	$120	Continental Bank	

Attachm...

WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/ DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGE-MENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
David Sanders	Money Order	signed	denied	$45	11/25/80	Two submitted a)12/28/79	a) Sander's denied signature, Freeman says only "sample" not sent to New York	She purchased and signed money order
						b) 2/23/80	b) Not shown to Sanders	
David Sanders	Money Order	signed	denied	$25	1/3/80	none		
David Sanders	HFC check	endorsed David Sanders	admitted	$1009.58	1/22/80	1/22/80	admits signing	was not present when it was signed printed the names below signatures
Diana Sayoun	"	"		"	"	1/22/80	denies signing "Lenore Sanders"	

Mayer Morganroth
Attorney at Law
Suite 344 B Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075

ROYAL OAK, MI
PM
4 MAY
1992
82 MAY 6 A10:

Lois Lerman, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

201390

RECEIVED
Ccc# 7678
82 MAY 6 A9:21

Mayer Morganroth
Attorney at Law

Telephone (313) 355-3084
TWX 8102244558 Morganroth Sofd

Suite 314-B Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075

May 4, 1982

82 MAY 6 A10:34

Lois Lerman, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: Dolbeare v. F.E.C.
and Citizens for La Rouche
MURS

Dear Ms. Lerman:

This letter is at your request to exhibit my clients' good faith offer to settle and resolve the outstanding issues between themselves and the Commission.

We would stipulate to the dismissal of the case pending in front of Judge Briant on the following conditions, language is flexible of course:

(1) A satisfactory informal conciliation resolution is made to all MURS.

(2) The parties both stipulate that the case be dismissed with prejudice and without costs and that verbiage be contained in said stipulation and dismissal that such was done without any admission that the suits allegations of harassment could be proven or in fact were committed.

(3) The dismissals of the litigation and MURS include that they are with prejudice to all litigants and that the government and the parties all agree that all further

proceedings in any forum or for any purpose are barred forevermore.

Trusting that this proposal meets with your approval, I remain,

Very truly yours,

Mayer Morganroth

MM/be

3 3 1 0 7 1 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1982

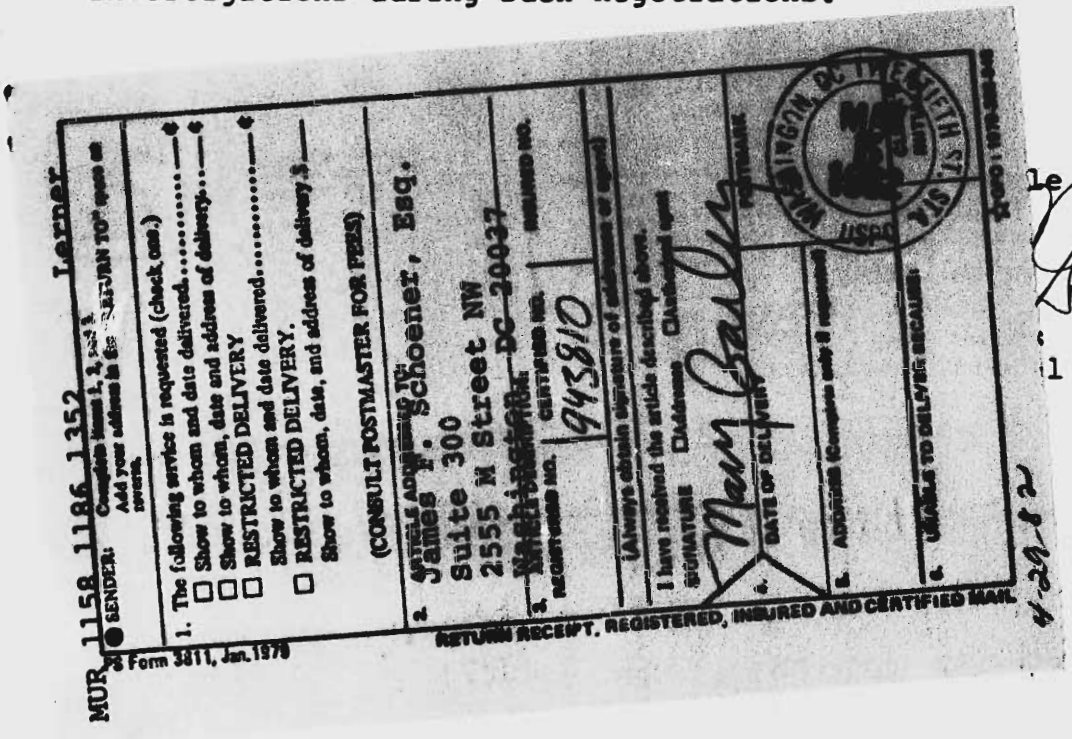
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Dear Mr. Schoener:

This is in response to that portion of your April 19, 1982 letter which asked that conciliation be used to close out the Citizens for LaRouche MURs.

As indicated in our February 19, 1981 letter (enclosed herein), the Commission is interested in exploring the possibility of entering into conciliation negotiations with Citizens for LaRouche. Should you wish to go forward with such negotiations, please contact Ms. Lois Lerner at 523-4175 and set up an appointment to discuss the matter. As, however, your letter indicates that there is some dispute over both the existence of violations by Citizens for LaRouche and the extent thereof, the Commission feels it is necessary to continue its MUR investigations during such negotiations.



le

l Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) All Pending CFL MURS
Citizens for LaRouche)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on April 27, 1982, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in the above-captioned matter:

1. Approve the letter attached to the General Counsel's April 23, 1982 report,

2. Deny respondent's request to stay on-going investigations during the discussions of conciliation terms.

3. Notify the respondent of these actions.

Commissioners Aikens, Harris, McGarry, and Reiche voted affirmatively for the decision; Commissioner Elliott dissented. Commissioner McDonald was not present at the time of the vote.

Attest:

4-27-82
Date

Marjorie W Emmons
Marjorie W. Emmons
Secretary of the Commission

0 3 7 1 1

Agenda Document #X82-049

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

EXECUTIVE SESSION

27 APR 1982

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

82 APR 23 P 5: 32

Submitted Late

April 23, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Citizens for LaRouche MURs -- Request for Informal Conciliation

Please place the attached document on the agenda for April 27, 1982. We apologize for the late submission of this document however it deals with very recent developments in the LaRouche MURs which we feel should be brought immediately to the Commission's attention and which should be discussed at the same meeting at which the Dolbeare litigation is discussed.

Attachment

201203 GU#7575

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 300
2555 M STREET, N.W.
WASHINGTON, D.C. 20037

TELEPHONE (202) 822-9333

DETROIT OFFICE
2500 DETROIT BANK & TRUST BUILDING
DETROIT, MICHIGAN 48226
(313) 963-6420

BIRMINGHAM OFFICE
WABEEK BUILDING
BIRMINGHAM, MICHIGAN 48012
(313) 645-5000

MONROE OFFICE
EXECUTIVE CENTRE
216 EAST ELM AVENUE
MONROE, MICHIGAN 48161
(313) 243-2000

TRAVERSE CITY OFFICE
13900 WEST BAY SHORE DRIVE
TRAVERSE CITY, MICHIGAN 49684
(616) 946-1000

LANSING OFFICE
110 BUSINESS & TRADE CENTER
200 WASHINGTON SQUARE NORTH
LANSING, MICHIGAN 48933
(517) 487-2070

ROBERT D. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
LAWRENCE D. OWEN
COUNSEL

EMMETT E. EAGAN
WILLIAM G. BUTLER
JOHN A. GILBAY, JR., P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD B. DUSHÉE, P.C.
PETER P. THURBER
LAWRENCE A. KING, P.C.
ROBERT E. HAMMELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C. *
GEORGE E. PARKER III *
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
ROBERT S. RETCHUM
SAMUEL J. MCAIN III, P.C.
ROGGUE E. CLIFFORD, P.C.
JOEL L. PIELL
ROBERT E. GILBERT
BRUCE D. SINGBAUER
DAVID OLMSTEAD
GEORGE T. STEVENSON

JOHN A. THURBER
ORIN D. BRUSTAD
CARL H. VON ENDE
GORDON A. BECKER
DAVID D. JOSWICK
CHARLES L. BURLEIGH, JR.
JOHN A. HARPER
GREGORY L. CURTNER
DENNIS R. NEIMAN
KENNETH E. KONOP
LEONARD D. GIVENS
W. MACK FAISON
MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS G. SCHROETER
THOMAS R. HUSTOLES
JOHN D. PIRICH
WILLIAM J. DANNOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
JAMES W. GOSS
JOSEPH A. GODLEWSKI
MICHAEL W. HARTMANN
KENT E. SHAFER
DENNIS A. LOY

* ADMITTED IN MICHIGAN & DISTRICT OF COLUMBIA

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS M. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1948)

FRANK L. ANDREWS
THOMAS W. LINN
RICHARD J. MAREK
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
JOHN J. COLLINS, JR.
DONNA J. DONATI
DONALD W. REIN
LARRY J. SAYLOR *
CHARLES E. SCHOLL
RICHARD J. BERTAR
MICHAEL R. ATKINS
MAUREEN P. AUGHTON
LELAND D. BARRINGER
EDW. D. EINOWSKI
TIMOTHY E. BOCHOCKI
THOMAS C. PHILLIPS
KRISTINE J. GALIEN
HUGH M. SMITH
MARJORY G. BABILE
TERRENCE M. CRAWFORD
STEPHEN R. GOODSTEIN
SALLY S. HARWOOD

RYAN M. HARWOOD
ALINE M. LOTTER
GEORGE S. MARTIN
CHARLES M. MCCUEN
GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WETHING
BRANT A. FREER
JOHN D. STOUT
AMANDA VAN DUSEN
BRIAN A. KABER
GARY A. BRUDER
RONALD J. CLAPHAM
DAVID T. DIXON
SALLY L. GEIB
DOUGLAS G. BEGGA
RAY I. JOHNSON
JENNA RUTH JOHNSTON
E. ELIZABETH PERLMAN
FREDERICA STICHNOTH
J. SCOTT TIMMER
JOAN BECKMAN WHITMORE
CONRAD G. MALLETT, JR.
JOHN D. DAVIS

April 19, 1982

HAND DELIVERED

Ms. Marsha Gentner
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: Dolbeare v. F.E.C.
80 Civ 4468

Dear Ms. Gentner:

Recently we were discussing the possibility of settling the disputes and contentions between the Citizens for LaRouche and the Federal Election Commission that are involved in the New York City Federal District Court. This would be accomplished through a conciliation proceeding under 2 U.S.C. §437g.

Basically, as I see it, there are several different contentions raised by the Commission against the LaRouche organization:

1. Certain C.F.L. volunteer fund raisers took cash contributions from contributors and converted such contributions into money orders and then mailed them to the C.F.L. New York offices. MURs 1158, 1186, 1352.

2. Certain C.F.L. volunteers received cash contributions in excess of $100 but immediately purchased money orders to evidence (and convert) such cash to negotiable instruments. MURs 1158, 1186, 1352.

3. Some of such money orders were presented to the F.E.C. for matching funds under the Presidential Election Campaign Fund Act.

4. Separate documentation by the contributors was furnished by C.F.L. to indicate the contribution.

5. Certain C.F.L. volunteers used their personal credit cards to pay expenses of the campaign with the expectation of being reimbursed by C.F.L. and in some instances the total amounts so advanced exceeded contribution limits. MURs 1253, 1262, 1344.

6. A bookkeeping error, admitted by C.F.L. and for which the amount was repaid to the Treasury immediately after discovery, is now claimed to be "circumstantial evidence" of intent to defraud the U.S. MUR 1374.

7. MUR 1236 - F.E.C. voted no further action on August 18, 1981.

8. Audit - The affiliated committee "Teamsters for LaRouche" has been requested to release the requested information and a separate request the bank has been made. Because of internal friction (partially caused by F.E.C. harassment) C.F.L. is finding former volunteers reluctant to become involved.

10. Audit - New Hampshire expenses. Since the LaRouche campaign had to try to show its viability nationwide by showing its activity in the New Hampshire primary election, the strategy of C.F.L. was to use the New Hampshire campaign materials and communications nationwide. A great deal of the materials and expenses F.E.C. auditors attempt to allocate to New Hampshire were actually used and expended to campaign in other states. The winding down expenses are being justified by the accountants. (The most recent request for audit information hand delivered on April 19, 1982 goes far beyond the minimum that legal counsel indicated to the New York Court was need to finish the audits).

We, of course, believe that the actions of C.F.L. on all of these matters were proper and legal, but if there were violations by volunteer workers, such were technical and did not violate the

spirit of the F.E.C.A. By letter of February 13, 1981 I suggested that the conciliation provisions of this law were specifically drawn to address the problems raised in these contentions; now over a year later conciliation has still not occurred.

I repeat that such conciliation should be used to close out these matters. On behalf of my clients we are willing to agree that such practices should not be repeated but would insist that the prohibitions against such acts was anything but clear.

As you are well aware, the C.F.L. is woefully in debt (approximately $400,000.00) and anticipation of substantial fund-raising is remote. We believe the actions of the F.E.C. were a considerable factor in chilling such fund raising. No civil penalty can be offered in such conciliation because of the substantial legal costs already involved and because any funds paid would only reduce the amounts needed to pay legitimate debts to creditors of the committee.

In the New York Court you indicated that deposition of 17 persons were needed to complete the F.E.C. investigations. As of today you have sent notice of 19 depositions starting April 26, 27, and 28. Since it will be impossible to consider this letter in that period of time, I suggest that those dates be adjourned to a later date.

The futility of continuing on the present course by the F.E.C. seems to me to be counter-productive to the United States and would not correct the so-called violations. A conciliation agreement (while it does not constitute precedent under F.E.C. doctrine) at least would be some notice to others that these practices are no longer allowed, and, perhaps your regulations could be so amended in time for the next presidential election. My co-counsel also requests that you provide dates at which the Commissioners as well as former Commissioner Tiernan would be available for deposition if conciliation is not going to be forthcoming.

If conciliation can be utilized on the basis outlined, I believe we should notify the Court and should postpone further discovery until we see if agreement can be reached.

Sincerely,

James F. Schoener

James F. Schoener

JFS/mco

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 19, 1981

HAND DELIVERED

James F. Schoener, Esquire
Jenkins, Nystrom & Sterlacci
2033 M Street, N.W.
Washington, D.C. 20036

RE: MUR 1186

Dear Mr. Schoener:

The Commission is in receipt of your letter dated February 13, 1981, wherein you propose that the Commission and Citizens for LaRouche enter into conciliation negotiations encompassing all matters relating to the 1979-1980 activities of the Citizens for LaRouche, Inc. As you are aware, the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. See 11 C.F.R. § 111.18(d). The Commission has not made any probable cause to believe findings with respect to any matters concerning Citizens for LaRouche. Nonetheless, the Commission is interested in exploring the possiblity of entering into conciliation negotiations with Citizens for LaRouche. Members of my staff are available to meet with you at a mutually convenient time to discuss such a possibility. However, the Commission is not willing to withdraw the subpoenas issued to Sam and Antoinette Kahl, William Jennings, Robert Musmansky, John Billows and Martin Simon as a condition to negotiate.

In your letter, you contend that the Commission disobeyed the court's order in Gelman v. FEC, Civil Action No. 80-2471 (D.D.C. 1980), by issuing the above-noted subpoenas without first notifying Citizens for LaRouche pursuant to 2 U.S.C. § 437g(a)(2) and corresponding regulations. We respectfully disagree. The aforementioned subpoenas were issued in connection with Commission MUR 1186. Citizens for LaRouche was notified of the Commission's investigation by letter dated

March 27, 1980, (attached) and received the General Counsel's Legal and Factual Analysis which formed a basis for the Commission's decision. The Commission is under no obligation whatsoever to notify Citizens for LaRouche of any witness it subpoenas in connection with MUR 1186. Any additional notice to CFL is not required inasmuch as CFL has no right to attend the depositions of witnesses subpoenaed to testify in connection with MUR 1186. See FEC v. Illinois Medical Political Action Committee, No. 78C. 1138 (N.D. Ill. 1978). Judge Flannery has also taken this position. See transcript pages 10 through 13 of FEC v. American Medical Political Action Committee, Misc. No. M 78-0198 (D.D.C. 1978) (attached) See also FEC v. CFL, Misc. #80-0203 (D.D.C. 1980). Thus, the Commission has fully complied with Judge Flannery's October, 1980, order by notifying Citizens for LaRouche by letter dated March 27, 1980, of the investigation pursuant to 2 U.S.C. § 437g(a)(2).

As of February 19, 1981, the Commission has not received a letter of representation signed by the above identified witnesses to this investigation that you are to be counsel of record. Thus, the Commission is acting on the assumption that you do not represent these individuals. If this assumption is wrong, please advise your clients to notify the Commission in writing as soon as possible that you are to be attorney of record. Please telephone Robert Bogin at 523-4000 to clarify whether you in fact represent these witnesses. In addition, contact Mr. Bogin for the purpose of scheduling a meeting to discuss negotiation possibilities.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Letter dated March 27, 1980 to CFL
FEC v. AMPAC - transcript
FEC v. IMPAC

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Dear Mr. Schoener:

This is in response to that portion of your April 19, 1982 letter which asked that conciliation be used to close out the Citizens for LaRouche MURs.

As indicated in our February 19, 1981 letter (enclosed herein), the Commission is interested in exploring the possibility of entering into conciliation negotiations with Citizens for LaRouche. Should you wish to go forward with such negotiations, please contact Ms. Lois Lerner at 523-4175 and set up an appointment to discuss the matter. As, however, your letter indicates that there is some dispute over both the existence of violations by Citizens for LaRouche and the extent thereof, the Commission feels it is necessary to continue its MUR investigations during such negotiations.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

February 19, 1981 letter



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

1) Belinda A. DeGrazia - Baltimore

2) Steven G. Warm - Baltimore

3) Robert Cole — Chicago

4) Gerald Rose - Chicago

5) Felice M. Gelman

During your conversation with Ms. Lerner you indicated that you do not consider the MUR investigations and the Dolbeare litigation to be separate matters. Please be informed, however, that this Office will treat them separately for investigative purposes. Accordingly, all correspondence concerning MURs 1158, 1186, 1352 and 1384 should be directed to Ms. Lerner; all correspondence concerning MURs 1253 and 1374 should be directed to Michael Dymersky; and, all correspondence concerning the litigation should continue to be directed to Marsha Gentner.

As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By: _____
Kenneth A. Gross
Associate General Counsel

4 3 0 4 0 3 7 1 1 2

Lerner

9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

1) Belinda A. deGrazia - MUR 1158

2) Steven G. Warm - MUR 1158

3) Gerald Rose - MUR 1352

4) Robert Cole - MUR 1352

5) Felice Gelman - MUR 1158, 1186, 1352

Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,

Kenneth A. Gross
Associate General Counsel

8207130112

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche
MUR Deposition Schedule

Dear Mr. Schoener:

Ms. Gentner has forwarded a copy of your April 21, 1982 letter concerning the deposition schedule to me. I was unable to determine from that letter whether you were postponing both the enforcement and the litigation depositions scheduled for April 26-29th, or merely the litigation depositions. Your proposed deposition schedule does not include the name Belinda deGrazia, a witness scheduled for enforcement deposition only, nor does it explain whether Steven Warm, Robert Cole and Felice Gelman are represented by you for purposes of both the enforcement and litigation depositions. By letters dated April 6 and April 20, enclosed herein, I asked you to inform this Office of your status as counsel for the five witnesses scheduled for depositions pursuant to the MUR investigations. As of this date, I have received no response to that request. Absent such information, we must assume you are not representing those witnesses at the MUR depositions, and proceed with our original schedule, including the Belinda deGrazia and Steven Warm April 26 and April 29th depositions in Baltimore.

In the event that you are representing these witnesses for purposes of the enforcement depositions, Lois Lerner of this Office should be notified immediately.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

1) April 6, 1982 letter to counsel
2) April 20, 1982 letter

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 27, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David B. Mitchell, Esq.
Mitchell & Lee, P.A.
2105 North Charles Street
Baltimore, Maryland 21208

Re: MUR 1158

Dear Mr. Mitchell:

This is to confirm your April 23, 1982 conversation with Lois Lerner of this Office concerning the above-referenced matter. During that conversation you told Ms. Lerner that, due to a change in your address, you had not received our April 15, 1982 letters scheduling the depositions in MUR 1158. You also stated that you had represented Ms. Belinda A. deGrazia for purposes of MUR 1158 in the past, but were unsure whether you would be representing her for the contemplated depositions.

As our files reflect that you are the attorney of record for the witness, Ms. Lerner asked you to contact Ms. deGrazia to cancel the deposition scheduled for April 26, 1982. It was then agreed that Ms. Lerner would reschedule the depositions so to afford you an opportunity to determine your status as counsel. The new deposition schedule is as follows:

1) Belinda A. deGrazia

Tuesday, June 1, 1982 at 2:30 p.m., Fallon Federal Building, Room 308, 31 Hopkins Plaza, Baltimore, Maryland.

If you have any questions please contact Lois Lerner at (202) 523-4175.

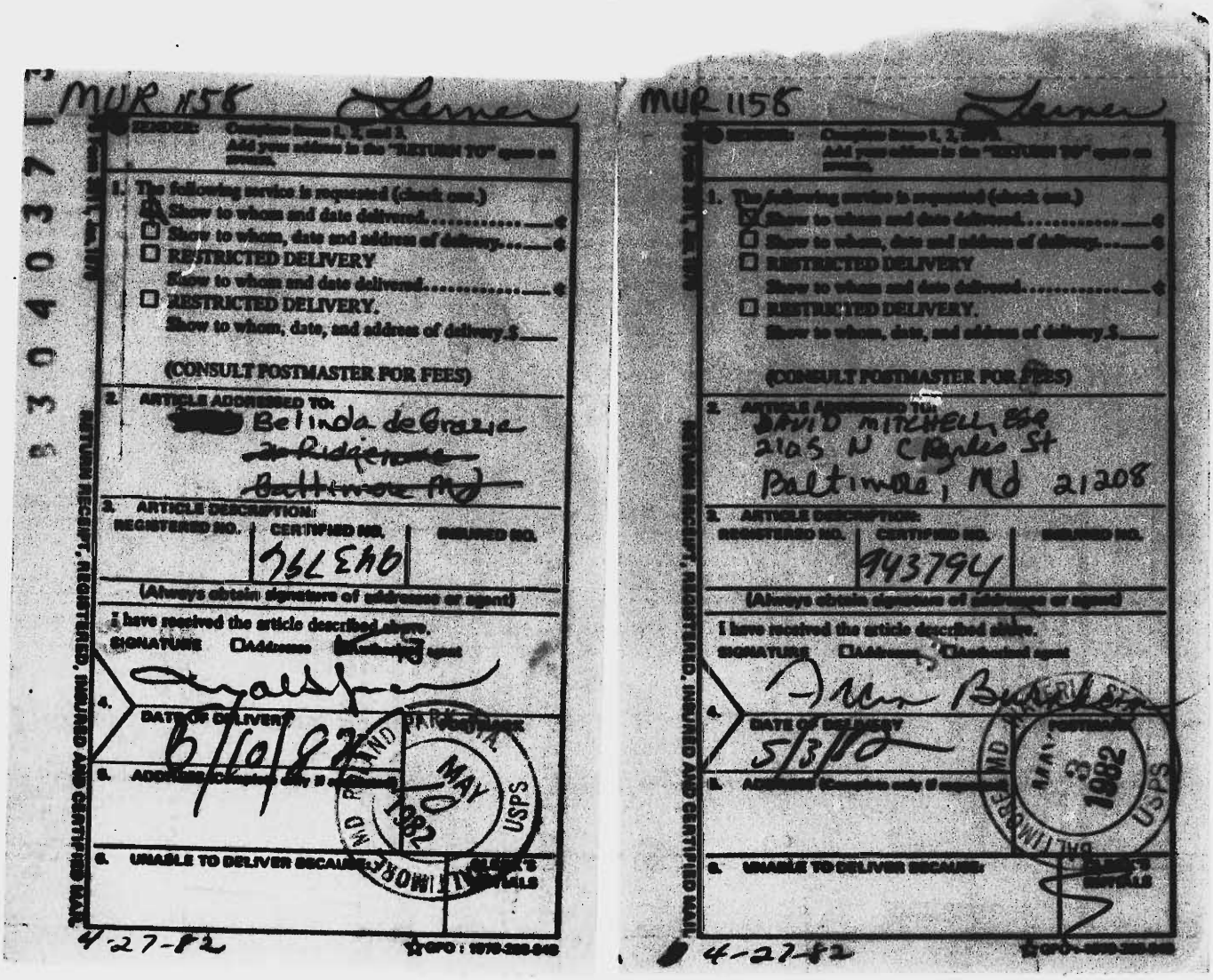
Sincerely,

Lawrence M. Noble
Assistant General Counsel

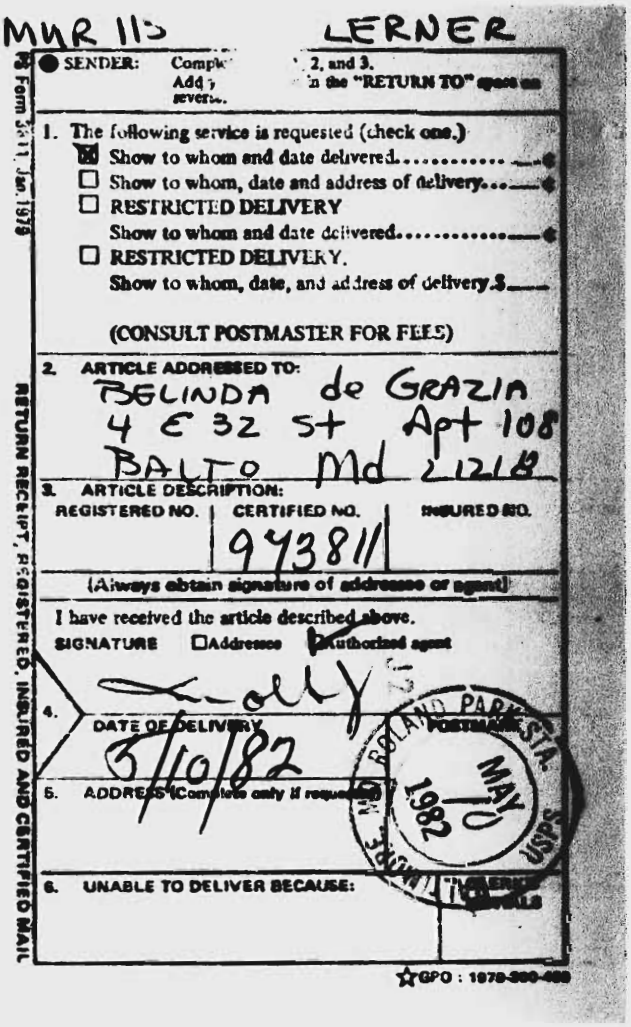
Attachment

April 15, 1982 letter

cc: Belinda deGrazia



MUR 113 LERNER



SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☒ Show to whom and date delivered.....
   - ☐ Show to whom, date and address of delivery.....
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered.....
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
BELINDA de GRAZIA
4 E 32 St Apt 108
BALTO Md 21218

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943811	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☒Authorized agent

4. DATE OF DELIVERY 5/10/82

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK: ROLAND PARK STA. MAY 10 1982 USPS

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-488

7 9 0 5 7 1 1 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 27, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David B. Mitchell, Esq.
Mitchell & Lee, P.A.
2105 North Charles Street
Baltimore, Maryland 21208

Re: MUR 1158

Dear Mr. Mitchell:

This is to confirm your April 23, 1982 conversation with Lois Lerner of this Office concerning the above-referenced matter. During that conversation you told Ms. Lerner that, due to a change in your address, you had not received our April 15, 1982 letters scheduling the depositions in MUR 1158. You also stated that you had represented Mr. Steven G. Warm for purposes of MUR 1158 in the past, but were unsure whether you would be representing him for the contemplated depositions.

As our files reflect that you are the attorney of record for the witness, Ms. Lerner asked you to contact Mr. Warm to cancel the deposition scheduled for April 29, 1982. It was then agreed that Ms. Lerner would reschedule the depositions to afford you an opportunity to determine your status as counsel. The new deposition schedule is as follows:

2) Steven G. Warm

Tuesday, June 1, 1982 at 2:30 p.m., Fallon Federal Building, Room 308, 31 Hopkins Plaza, Baltimore, Maryland.

If you have any questions please contact Lois Lerner at (202) 523-4175.

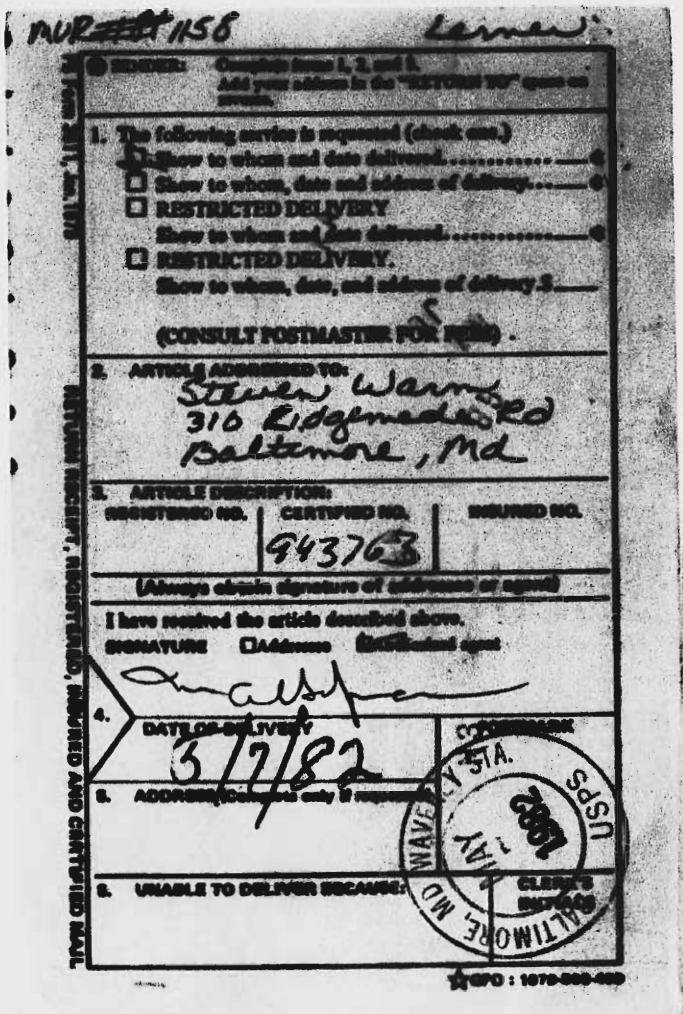
Sincerely,

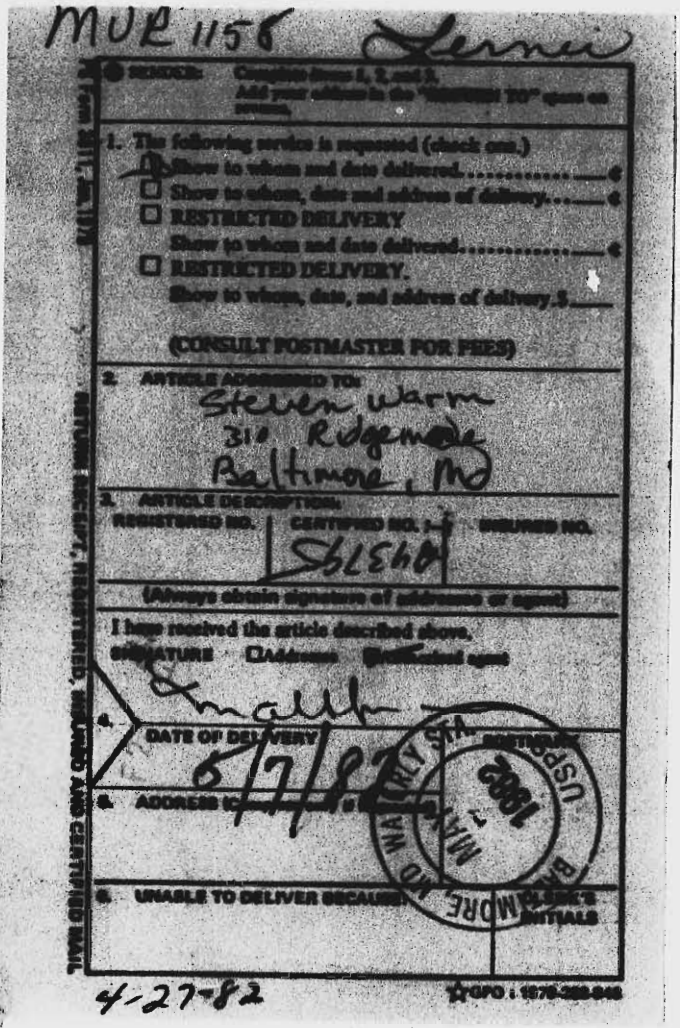
Lawrence M. Noble
Assistant General Counsel

Attachment

April 15, 1982 letter

cc: Steven W. Warm





MUR 1158

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1982

HAND DELIVERED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche
MUR Deposition Schedule

Dear Mr. Schoener:

Ms. Gentner has forwarded a copy of your April 21, 1982 letter concerning the deposition schedule to me. I was unable to determine from that letter whether you were postponing both the enforcement and the litigation depositions scheduled for April 26-29th, or merely the litigation depositions. Your proposed deposition schedule does not include the name Belinda deGrazia, a witness scheduled for enforcement deposition only, nor does it explain whether Steven Warm, Robert Cole and Felice Gelman are represented by you for purposes of both the enforcement and litigation depositions. By letters dated April 6 and April 20, enclosed herein, I asked you to inform this Office of your status as counsel for the five witnesses scheduled for depositions pursuant to the MUR investigations. As of this date, I have received no response to that request. Absent such information, we must assume you are not representing those witnesses at the MUR depositions, and proceed with our original schedule, including the Belinda deGrazia and Steven Warm April 26 and April 29th depositions in Baltimore.

In the event that you are representing these witnesses for purposes of the enforcement depositions, Lois Lerner of this Office should be notified immediately.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

1) April 6, 1982 letter to counsel
2) April 20, 1982 letter

7103713

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

1) Belinda A. DeGrazia - Baltimore

2) Steven G. Warm - Baltimore

3) Robert Cole - Chicago

4) Gerald Rose - Chicago

5) Felice M. Gelman

During your conversation with Ms. Lerner you indicated that you do not consider the MUR investigations and the Dolbeare litigation to be separate matters. Please be informed, however, that this Office will treat them separately for investigative purposes. Accordingly, all correspondence concerning MURs 1158, 1186, 1352 and 1384 should be directed to Ms. Lerner; all correspondence concerning MURs 1253 and 1374 should be directed to Michael Dymersky; and, all correspondence concerning the litigation should continue to be directed to Marsha Gentner.

As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By: _____
Kenneth A. Gross
Associate General Counsel

2140371 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

1) Belinda A. deGrazia - MUR 1158

2) Steven G. Warm - MUR 1158

3) Gerald Rose - MUR 1352

4) Robert Cole - MUR 1352

5) Felice Gelman - MUR 1158, 1186, 1352

Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,

Kenneth A. Gross
Associate General Counsel

3 3 7 4 0 6 7 1 3

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 APR 23 P5: 32

April 23, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Citizens for LaRouche MURs -- Request for Informal Conciliation

By letter dated April 19, 1982, James Schoener, counsel for Citizens for LaRouche (CFL), requested that the Commission enter into conciliation with his client concerning all pending CFL MURs,1/ and postpone further investigation and discovery until it is determined whether a conciliation agreement concerning those MURs can be reached.

Although the Commission may enter into conciliation negotiations at any time, it is not required to do so unless and until it makes a finding of probable cause to believe. 2 U.S.C. § 437g(a)(4); 11 C.F.R. § 111.18(d). Since Mr. Schoener's letter clearly indicates that there is some dispute over both the existence of violations by CFL and the extent thereof, this Office recommends that the investigation be continued and that no proposed conciliation agreement be considered at this time. Instead, we recommend sending CFL the attached letter which explains that the Commission is willing to discuss conciliation terms with Mr. Schoener, but that it intends to continue its investigation during such discussions.

1/ In February, 1981, Mr. Schoener sent a letter proposing that the Commission and CFL enter into conciliation negotiations. Our response expressed a willingness to discuss the matter with him and suggested he contact our Office to set up a mutually convenient appointment. (See Attachment II). Mr. Schoener has never contacted us to make such an appointment.

In addition to his request for postponement of the MUR investigations, Mr. Schoener also requests a stay of all litigative discovery in Dolbeare v. Fed. Election Comm'n. during the conciliation discussions. That is not a valid request because the litigation is separate from the enforcement action and could continue even if a conciliation agreement is reached. This confusion on Mr. Schoener's part between the enforcement and litigative aspects of the case is also evident in his statement concerning the number of depositions the Commission intends to take to complete its enforcement investigations. Only five of the scheduled depositions are being taken pursuant to the MUR investigations. The remainder relate to the Dolbeare litigation.2/ In addition, Mr. Schoener has ignored several requests that he indicate whether he represents the scheduled deponents for purposes of the MUR depositions, as well as the litigation depositions. (See Attachments V-VI.)

Recommendation

1) Approve attached letter.

2) Deny respondent's request to stay on-going investigations during those discussions.

3) Notify respondent.

Attachments

I. April 19, 1982 letter from James M. Schoener. (3 pages)

II. Commission's letter to Mr. Schoener dated February 19, 1981. (2 pages)

III. Proposed letter to Mr. Schoener. (1 page)

IV. April 6, 1982 letter to Mr. Schoener. (2 pages)

V. April 20, 1982 letter to Mr. Schoener. (2 pages)

VI. April 22, 1982 letter to Mr. Schoener. (2 page)

2/ A separate memorandum has been prepared regarding the status of the litigation discovery.

201236

RECEIVED
Acc# 7593
82 APR 21 P12:37

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 300
2555 M STREET, N.W.
WASHINGTON, D.C. 20037

TELEPHONE (202)-822-9333
TELECOPIER (202) 463-8071

2500 DETROIT BANK & TRUST BUILDING
DETROIT, MICHIGAN 48226
(313) 963-6420

WABEEK BUILDING
BIRMINGHAM, MICHIGAN 48012
(313) 645-5000

EXECUTIVE CENTRE
214 EAST ELM AVENUE
MONROE, MICHIGAN 48161
(313) 243-2000

13999 WEST BAY SHORE DRIVE
TRAVERSE CITY, MICHIGAN 49684
(616) 946-1000

110 BUSINESS & TRADE CENTER
200 WASHINGTON SQUARE NORTH
LANSING, MICHIGAN 48933
(517) 487-2070

ROBERT P. GRIFFIN*
CLEVELAND THURBER
JAMES F. SCHOENER*
LAWRENCE D. OWEN
COUNSEL

EMMETT E. EAGAN
WILLIAM G. BUTLER
JOHN A. GILRAY, JR. P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD B. GUSHEE, P.C.
PETER P. THURBER
LAWRENCE A. KING, P.C.
ROBERT E. HAMMELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C.*
GEORGE E. PARKER III*
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
ROBERT S. KETCHUM, P.C.
SAMUEL J. McKIM III, P.C.
ROCQUE E. LIPFORD, P.C.
JOEL L. PIELL
ROBERT E. GILBERT
BRUCE D. BIRGBAUER
DAVID OLMSTEAD

GEORGE T. STEVENSON
JOHN A. THURBER, P.C.
ORIN D. BRUSTAD
CARL H. von ENDE
GORDON A. BECKER
DAVID D. JOSWICK, P.C.
CHARLES L. BURLEIGH, JR.
JOHN A. MARXER, P.C.
GREGORY L. CURTNER, P.C.
DENNIS R. NEIMAN
KENNETH E. KONOP
LEONARD D. GIVENS
W. MACK FAISON
MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS O. SCHROETER
THOMAS P. HUSTOLES
JOHN D. PIRICH
WILLIAM J. DANHOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
MICHAEL W. HARTMANN
KENT E. SHAFER
JOHN J. COLLINS, JR.

* ADMITTED IN MICHIGAN & DISTRICT OF COLUMBIA

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

DENNIS R. LOY
FRANK L. ANDREWS
THOMAS W. LINN
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
DONNA J. DONATI
DONALD W. KEIM
LARRY J. SAYLOR*
CHARLES E. SCHOLL
RICHARD J. SERYAK
MICHAEL R. ATKINS
MAUREEN P. AUGHTON
LELAND D. BARRINGER
EDWARD J. ZINOWSKI
TIMOTHY D. SOCHOCKI
THOMAS C. PHILLIPS
HUGH M. SMITH
MARJORY O. SASILE
TERRENCE M. CRAWFORD
STEPHEN R. GOOSTREY
RYAN H. HAYWOOD
GEORGE G. MARTIN
CHARLES M. McCUEN

GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN D. STOUT
AMANDA VAN DUSEN
BRIAN A. KASER
GARY A. BRUDER
RONALD J. CLAPHAM
DAVID F. DIXON
SALLY L. GEIB
KAY I. JOHNSON
E. ELIZABETH PERLMAN
FREDERICK STICHNOTH
J. SCOTT TIMMER
CONRAD L. MALLETT, JR.
JOHN D. RAYIS
STEPHEN J. OTT
LINDA O. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLIAM
TANYA Y. HILL
NANETTE RUTKA

April 21, 1982

4:56

HAND DELIVERED

Marsha Gentner, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Dolbeare v. F.E.C. Depositions
Citizens for LaRouche MURs

Dear Ms. Gentner:

In response to your letter of April 20, 1982, please be advised that the scheduled depositions for April 26th-29th in Baltimore in the above-referenced matters and action should be postponed because my co-counsel and I will be unable to attend.

As it is presently contemplated, Mr. Mayer Morganroth, co-counsel, will be attending all of the depositions and suggests the alternate dates of May 18th and 19th for the Baltimore depositions. The May 5th date for St. Louis should also be adjourned, preferably to June 1st. These dates have been confirmed with Mr. Morganroth, and if they will not suit your schedules, please contact him directly at (313) 355-3084. The attached revised schedule would be followed thereafter.

We do reserve the right to object to the Portland, Oregon depositions and the St. Louis depositions, since the costs involved in taking that discovery are maximum and the discovery minimal. Since you have already deposed the Portland people previously, this seems to be wasteful on your part and certainly harassment of our people.

Please note that Mr. Morganroth proposes to take depositions of F.E.C. Commissioners and former Commissioner Tiernan on May 10th and 11th. I assume you will make arrangements to have them available.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:mfb
Enclosure
cc w/e: Mayer Morganroth, Esq.

RECEIVED
82 APR 21 P12:37

Schedule of Depositions

May 3, 1982	Chicago	Rose
May 4, 1982	Chicago	Cole
May 10, 1982	Washington	Commissioners
May 11, 1982	Washington	Commissioners
May 18, 1982	Baltimore	Radcliffe
May 18, 1982	Baltimore	Warm
May 18, 1982	Baltimore	Raney
May 19, 1982	Baltimore	Robinson
May 19, 1982	Baltimore	Freeman
May 20, 1982	Washington	Simon
May 24, 1982	N.Y.C.	Gelman
May 25, 1982	N.Y.C.	Forrest
May 25, 1982	N.Y.C.	Burdman
May 26, 1982	N.Y.C.	Dolbeare
*June 1, 1982	St. Louis	Carr
*June 10, 1982	Portland, Oregon	Mrs. Kahl
*June 10, 1982	Portland, Oregon	Sam Kahl
*June 11, 1982	Portland, Oregon	Billows
*June 11, 1982	Portland, Oregon	Mursmansky

*We reserve the right to ask the Court to limit these depositions in light of the cost involved and limited area of discovery.

8304037134 3

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
SUITE 300
2555 M STREET, N.W.
WASHINGTON, D. C. 20037

jfs

TO:

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

7632

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2 APR 30 A9:45

ACKNOWLEDGEMENT OF RECEIPT

This is to acknowledge receipt of 2 letters from the Federal Election Commission addressed to:

James F. Schoener
Miller, Canfield, Paddock & Stone
2555 M Street, N.W.
Washington, D.C. 20037

April 20, 1982
Date of receipt

MC Means
Signature of recipient

On behalf of:
James F. Schoener

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs 1158

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

1) Belinda A. deGrazia - MUR 1158

2) Steven G. Warm - MUR 1158

3) Gerald Rose - MUR 1352

4) Robert Cole - MUR 1352

5) Felice Gelman - MUR 1158, 1186, 1352

Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,

Kenneth A. Gross
Associate General Counsel

3 3 0 4 1 7 1 3 4 0

CCC# 7561

82 APR 15 P 3:59

LAW OFFICES OF

MILLER, CANFIELD, PADDOCK AND STONE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 300

2555 M STREET, N.W.

WASHINGTON, D.C. 20037

TELEPHONE (202)-822-9333

TELECOPIER (202)-463-8071

2500 DETROIT BANK & TRUST BUILDING
DETROIT, MICHIGAN 48226
(313) 963-6420

WARNER BUILDING
BIRMINGHAM, MICHIGAN 48011
(313) 645-5000

EXECUTIVE CENTRE
2nd EAST ELM AVENUE
MONROE, MICHIGAN 48161
(313) 243-2000

13685 WEST BAY SHORE DRIVE
TRAVERSE CITY, MICHIGAN 49684
(616) 946-1000

MID BUSINESS & TRADE CENTER
200 WASHINGTON SQUARE NORTH
LANSING, MICHIGAN 48933
(517) 487-2070

ROBERT P. GRIFFIN*
CLEVELAND THURBER
JAMES F. SCHOENER*
LAWRENCE D. OWEN
COUNSEL

EMMETT E. EADAN
WILLIAM G. BUTLER
JOHN A. GILRAY, JR. P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD B. DUSHEE, P.C.
PETER P. THURBER
LAWRENCE A. KING, P.C.
ROBERT E. HAMNELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C.*
GEORGE E. PARKER, II*
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HORPE
ROBERT S. KETCHUM, P.C.
SAMUEL J. McKIM III, P.C.
PROCOPE E. LIFFORD, P.C.
JOEL L. PHILL
ROBERT E. GILBERT
BRUCE D. BIRGBAUER
DAVID OLMSTEAD

GEORGE T. STEVENSON
JOHN A. THURBER, P.C.
ORIN D. BRUSTAD
CARL H. VON ENDE
GORDON A. BECKER
DAVID D. JOSWICK, P.C.
CHARLES L. BURLEIGH, JR.
JOHN A. MARZER, P.C.
GREGORY L. CURTNER, P.C.
DENNIS R. NEIMAN
KENNETH E. RONOP
LEONARD D. GIVENS
W. MACK FAISON
MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS G. SCHROETER
*THOMAS P. HUSTOLES
*JOHN D. PIRICH
WILLIAM J. DANNOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
MICHAEL W. HARTMANN
KENT E. SHAFER
JOHN J. COLLINS, JR.

DENNIS R. LOY
FRANK L. ANDREWS
THOMAS W. CINN
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
DONNA J. DONATI
DONALD W. REIN
LARRY J. SAYLOR*
CHARLES E. SCHOLL
RICHARD J. BERTAN
MICHAEL R. ATKINS
MAUREEN P. AUGHTON
LELAND D. BARRINGER
EDW. E. EINOWSKI
TIMOTHY D. SOCHOCKI
THOMAS C. PHILLIPS
HUGH M. SMITH
MARJORY G. BASILE
TERRENCE M. CRAWFORD
STEPHEN R. GOOSTREY
RYAN M. HAYWOOD
GEORGE G. MARTIN
CHARLES M. McCUEN

GERALD E. ROSEN
J. KEVIN TIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN B. STOUT
AMANDA VAN DUSEN
BRIAN A. RABER
GARY A. BRUDER
RONALD J. CLAPHAM
DAVID F. DEON
SALLY L. GEIB
RAY J. JOHNSON
E. ELIZABETH PERLMAN
FREDERICK STICHNOTH
J. SCOTT TIMMER
CONRAD L. MALLETT, JR.
JOHN D. RATIS
STEPHEN J. OTT
LINDA O. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLMAN
TANYA T. HILL
NANETTE RUTKA

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1938)
FERRIS D. STONE (1862-1948)

* ADMITTED IN MICHIGAN & DISTRICT OF COLUMBIA

HAND DELIVERED

April 15, 1982

Kenneth Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

MUR 1158

Re: Citizens for LaRouche MURS

Dear Mr. Gross:

I am in receipt of your letter of April 6, 1982, a letter from Marsha Gentner and telephone calls from Lois Lerner.

Ms. Gentner has served us with a discovery request for depositions involving 16 persons pursuant to Dolbeare et al. vs Federal Election Commission. Ms. Lerner has inquired as to representation concerning five witnesses in the pending investigations. In order to establish an orderly process of discovery agreeable to everyone concerned, please provide me by Friday with a list of every witness the FEC believes it must call in order to finish the outstanding investigations itemized by the MUR or MUR(s) to which the witnesses' testimony pertains.

Thank you for your attention to this matter.

Very truly yours,

James F. Schoener

James F. Schoener

JFS/mco

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
2555 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

1) Belinda A. DeGrazia - Baltimore

2) Steven G. Warm - Baltimore

3) Robert Cole -- Chicago

4) Gerald Rose - Chicago

5) Felice M. Gelman

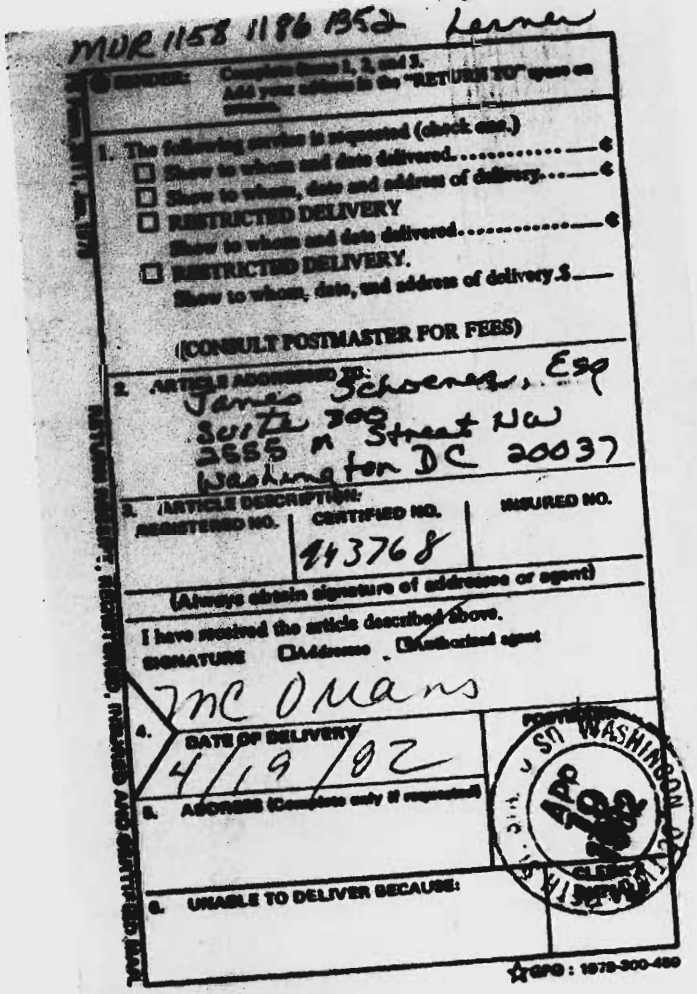
During your conversation with Ms. Lerner you indicated that you do not consider the MUR investigations and the Dolbeare litigation to be separate matters. Please be informed, however, that this Office will treat them separately for investigative purposes. Accordingly, all correspondence concerning MURs 1158, 1186, 1352 and 1384 should be directed to Ms. Lerner; all correspondence concerning MURs 1253 and 1374 should be directed to Michael Dymersky; and, all correspondence concerning the litigation should continue to be directed to Marsha Gentner.

As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By: _____
Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David B. Mitchell, Esq.
Mitchell & Lee, P.A.
Suite 810
Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

Re: MUR 1158

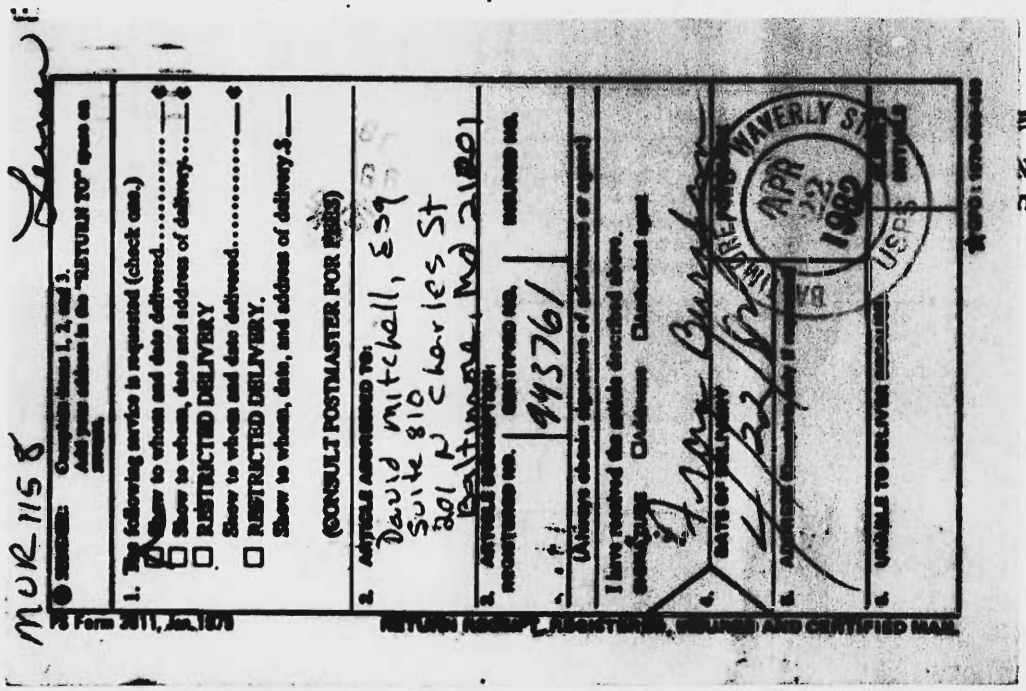
Dear Mr. Mitchell:

The recent decision in Dolbeare v. Fed. Election Comm'n., No. 81 CIV 4468 (S.D.N.Y. March 9, 1982), permits the Federal Election Commission to continue its investigation in the above-referenced matter. This is to notify you, as attorney of record, of the following deposition schedule:

1) Belinda A. deGrazia

Monday, April 26, 1982 at 2:30 p.m., United States Courthouse, Room 820, 101 W. Lombard Street, Baltimore, Maryland.

If you have any questions please contact Lois Lerner, the attorney handling this matter, at (202) 523-4175.



Noble
neral Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David B. Mitchell, Esq.
Mitchell & Lee, P.A.
Suite 810
Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

The recent decision in Dolbeare v. Fed. Election Comm'n., No. 81 CIV 4468 (S.D.N.Y. March 9, 1982), permits the Federal Election Commission to continue its investigation in the above-referenced matter. This is to notify you, as attorney of record, of the following deposition schedule:

2) Steven G. Warm

Thursday, April 29, 1982 at 2:30 p.m., Fallon Federal Building, Room 308, 31 Hopkins Plaza, Baltimore, Maryland.

If you have any questions please contact Lois Lerner, the attorney handling this matter, at (202) 523-4175.

Sincerely,

Lawrence M. Noble
Assistant General Counsel

cc: Steven W. Warm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1981

David B. Mitchell, Esquire
Mitchell & Lee, P.A.
Suite 810
Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

The Commission has reviewed motions to quash subpoenas directed to your clients Robert Robinson, Steven Warm, Vivien Raney, Florence Hurley and Belinda de Grazia pursuant to 11 C.F.R. § 111.15. This is to inform you that the Commission has denied these motions. Accordingly, and in accordance with arrangements made by you with Robert Bogin of this Office, depositions have been rescheduled for July 22 according to the following schedule:

9:30 a.m.	Florence Hurley
10:15 a.m.	Vivien Raney
11:00 a.m.	Steven Warm
12:15 p.m.	Robert Robinson
2:00 p.m.	Belinda de Grazia.

If you have any questions, please direct them to Mr. Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

David B. Mitchell, Esquire
Mitchell & Lee, P.A.
Suite 810
Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

The Commission has reviewed motions to quash subpoenas directed to your clients Robert Robinson, Steven Warm, Vivien Raney, Florence Hurley and Belinda de Grazia pursuant to 11 C.F.R. § 111.15. This is to inform you that the Commission has denied these motions. Accordingly, and in accordance with arrangements made by you with Robert Bogin of this Office, depositions have been rescheduled for July 22 according to the following schedule:

9:30 a.m.	Florence Hurley
10:15 a.m.	Vivien Raney
11:00 a.m.	Steven Warm
12:15 p.m.	Robert Robinson
2:00 p.m.	Belinda de Grazia.

If you have any questions, please direct them to Mr. Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

7/21

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1158
Debra J. Hanania,	)	
a.k.a. Debra Hanania Freeman	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 20, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1158:

1. Deny the motion to quash filed by Robert Robinson, Steven Warm, Belinda de Grazia, Florence Hurley and Vivien Raney.

2. Notify the witnesses of the Commission's action.

Commissioners Aikens, Harris, McGarry, Reiche and Tiernan voted affirmatively in this matter; Commissioner Thomson did not cast a vote.

Attest:

7-21-81
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 7-16-81, 10:13
Circulated on 48 hour vote basis: 7-16-81, 4:00

July 16, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1158

Please have the attached Memo to the Commission distribubed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Bogin

The standard the Commission should utilize in reviewing a motion to quash a subpoena should be the same one the district court applies in a subpoena enforcement action. The time honored standard for subpoena enforcement is set forth in United States v. Morton Salt, 338 U.S. 632 (1950). The court stated that an agency is permitted to have its subpoena enforced if the investigation is "within the authority of the agency, the demand is not too indefinite and the information sought is reasonably relevant." Id. at 652. Applying the Morton Salt standard to the present situation results in an upholding of the Commission's subpoenas. The only issue raised by the subpoenaed parties is that the Commission's subpoena should be quashed since the Commission already has all relevant information concerning this matter. This assertion is simply not true.

MUR 1158 was generated by an audit referral and involves an investigation of contributions made to Citizens for LaRouche and submitted by CFL for matching funds. The purpose of deposing the witnesses is to determine whether they made contributions to CFL and whether such contributions were matchable. A review of money orders submitted by CFL in the names of Robert Robinson, Belinda de Grazia and Steven Warm reveal certain handwriting patterns that create doubt as to the matchability of these contributions. Florence Hurley Vivien Raney were selected for depositions because their checks contained notations indicating that their payments to CFL were not intended as contributions, but as consideration for publications. Contributions which are made by persons without the necessary donative intent to make a gift or made for any purpose other than to influence the result of a primary election are not matchable. 11 C.F.R. § 9034.3(j).

As the above-discussion demonstrates, the Commission is seeking information relevant to its investigation into this MUR. Inasmuch as the information sought is directly relevant to the investigation, it must be presumed that the Commission's purpose in obtaining this information is to uncover the facts and not to harass. Furthermore, the Commission cannot be required to conciliate this matter until it is convinced that all information relevant to its investigation is obtained.

The recent case of the FEC v. Machinists Non-Partisan Political League, Civil Action No. 80-1136 (D.Cir. May 19, 1981) does not alter the analysis as set forth above. The MNPL case was concerned about the Commission's underlying jurisdiction to investigate draft committees. Since the issue of the Commission's underlying jurisdiction to investigate CFL is

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 JUL 16 A10: 13

July 16, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Motion to Quash Depositions in MUR 1158

On June 11, 1981, the Commission authorized the issuance of subpoenas to Robert A. Robinson, Florence Hurley, Steven G. Warm, Belinda F. de Grazia and Vivien Raney for the purpose of taking their deposition in connection with an investigation in MUR 1158. In almost identically worded letters, the four above-mentioned witnesses moved to quash the Commission's subpoenas on the ground that the Commission "has all the relevant facts" and that to proceed would be "political harassment". See Letters appended as Attachment I. An additional basis for quashing the subpoenas is the Commission's refusal to conciliate this matter. For the reasons more fully discussed below, the Commission should deny the motions to quash.1/

1/ These motions to quash were filed pursuant to 11 C.F.R. § 111.15 which states:

> Any person to whom a subpoena is directed may prior to the time specified therein for compliance, but in no event more than 5 days after the date of receipt of such subpoena, apply to the Commission to quash or modify such subpoena.

The five day period in which to quash was not met by Robert Robinson, Florence Hurley and Belinda de Grazia, but the time requirement was met by Steven Warm and Vivien Ramey. Inasmuch as the reasons stated by all four witnesses to quash the subpoenas are almost identical and Dr. Robinson, Mrs. Hurley and Ms. de Grazia have requested a special extension of time to file a motion to quash, it is the opinion of this Office that the Commission consider all five motions.

The standard the Commission should utilize in reviewing a motion to quash a subpoena should be the same one the district court applies in a subpoena enforcement action. The time honored standard for subpoena enforcement is set forth in United States v. Morton Salt, 338 U.S. 632 (1950). The court stated that an agency is permitted to have its subpoena enforced if the investigation is "within the authority of the agency, the demand is not too indefinite and the information sought is reasonably relevant." Id. at 652. Applying the Morton Salt standard to the present situation results in an upholding of the Commission's subpoenas. The only issue raised by the subpoenaed parties is that the Commission's subpoena should be quashed since the Commission already has all relevant information concerning this matter. This assertion is simply not true.

MUR 1158 was generated by an audit referral and involves an investigation of contributions made to Citizens for LaRouche and submitted by CFL for matching funds. The purpose of deposing the witnesses is to determine whether they made contributions to CFL and whether such contributions were matchable. A review of money orders submitted by CFL in the names of Robert Robinson, Belinda de Grazia and Steven Warm reveal certain handwriting patterns that create doubt as to the matchability of these contributions. Florence Hurley Vivien Raney were selected for depositions because their checks contained notations indicating that their payments to CFL were not intended as contributions, but as consideration for publications. Contributions which are made by persons without the necessary donative intent to make a gift or made for any purpose other than to influence the result of a primary election are not matchable. 11 C.F.R. § 9034.3(j).

As the above-discussion demonstrates, the Commission is seeking information relevant to its investigation into this MUR. Inasmuch as the information sought is directly relevant to the investigation, it must be presumed that the Commission's purpose in obtaining this information is to uncover the facts and not to harass. Furthermore, the Commission cannot be required to conciliate this matter until it is convinced that all information relevant to its investigation is obtained.

The recent case of the FEC v. Machinists Non-Partisan Political League, Civil Action No. 80-1136 (D.Cir. May 19, 1981) does not alter the analysis as set forth above. The MNPL case was concerned about the Commission's underlying jurisdiction to investigate draft committees. Since the issue of the Commission's underlying jurisdiction to investigate CFL is

not an issue in this motion to quash, the standard of review set forth in MNPL is not applicable and need not be followed.

Recommendation

1. Deny the motion to quash filed by Robert Robinson, Steven Warm, Belinda de Grazia, Florence Hurley and Vivien Raney.

2. Notify the witnesses of the Commission's action.

Attachments

1. Letters of witnesses

2. Notification letter

0 0 0 3 7 1 5 1

81 JUL 7 P1:04

GCC# 5024

314 Broxton Road
Baltimore, Md. 21212
July 3, 1981

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1158

Gentlemen:

I received your subpoena asking me to appear for a deposition, apparently concerning contributions to the presidential campaign of Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called representatives of Citizens for LaRouche here in Baltimore to find out what this was about although I don't know whether this constitutes making the matter "public". Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed. I believe I gave my contribution legally.

I understand that extensive depositions concerning this matter have already been taken and that Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. Furthermore, I have been told that the General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. Therefore I request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I should believe, will remove any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

1 JUL 7 P2:24

Sincerely,

Robert A. Robinson

Robert A. Robinson, M.D.

Attachment 1 1 of 4

Doc #5048
81 JUL 10 AM : 52

July 2, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Vivien Raney

Vivien Raney

81058 6 004 3078
81 JUL 10 AM : 53

July 3, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Steven G. Warm

Steven G. Warm

101057

81 JUL 10 A11:53

GCC#5045

July 7, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Belinda Frances deGrazia

Belinda Frances deGrazia

3 of 5

Gee H 68

81 JUL 15 P1:06

July 7, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Flora F. Hurley

Mrs. Flora Hurley

1 JUL 15 P4:15

5 of 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David B. Mitchell, Esquire
Mitchell & Lee, P.A.
Suite 810
Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

The Commission has reviewed motions to quash subpoenas directed to your clients Robert Robinson, Steven Warm, Vivien Raney, Florence Hurley and Belinda de Grazia pursuant to 11 C.F.R. § 111.15. This is to inform you that the Commission has denied these motions. Accordingly, and in accordance with arrangements made by you with Robert Bogin of this Office, depositions have been rescheduled for July 22 according to the following schedule:

9:30 a.m.	Florence Hurley
10:15 a.m.	Vivien Raney
11:00 a.m.	Steven Warm
12:15 p.m.	Robert Robinson
2:00 p.m.	Belinda de Grazia.

If you have any questions, please direct them to Mr. Bogin at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Acting General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1981

John Hallmen
2077 Old Westminister Pike
Sandymount, MD

RE: MUR 1158

Dear Mr. Hallmen:

Earlier this month you spoke with Robert Bogin to confirm your appearance for a deposition on July 9, 1981 at 2:15 p.m. at the United States Attorney's Office in Baltimore. Thus, we were surprised when you failed to appear for your deposition at the designated place and time. If your failure to appear was an oversight, please contact Mr. Bogin at (202) 523-4000 to reschedule your deposition for July 22, 1981. Otherwise, the Commission may have to enforce its subpoena in the federal district court and seek costs.

Your cooperation in this matter would be appreciated.

Sincerely,

Kenneth A. Gross
Associate General Counsel

2 0 0 4 0 5 7 1 5 3

John Hallmen
2077 Old Westminister Pike
Sandymount, MD

RE: MUR 1158

Dear Mr. Hallmen:

Earlier this month you spoke with Robert Bogin to confirm your appearance for a deposition on July 9, 1981,at 2:15 p.m. at the United States Attorney's Office in Baltimore. Thus, we were surprised when you failed to appear for your deposition at the designated place and time. If your failure to appear was an oversight, please contact Mr. Bogin at (202) 523-4000 to reschedule your deposition for July 22, 1981. Otherwise, the Commission may have to enforce its subpoena in the federal didtrict court and seek costs.

Your cooperation in this matter would be appreciated.

Sincerely,

Kenneth A. Gross
Associate General Counsel

Diana Sahyoun
613 St. Anne's Avenue
Baltimore, MD 21218

RE: MUR 1158

Dear Mss. Sahyoun:

Enclosed please find a check for $35 made payable to you pursuant to 11 C.F.R. § 111.14 for witness fees and mileage for your appearance for deposition on July 9, 1981.

The Commission appreciates your cooperation in this matter. If you have any questions please contact me at (202) 523-4000.

Sincerely,

Robert I. Bogin
Attorney

Enclosure

Witness Fee Check

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1981

Diana Sahyoun
613 St. Anne's Avenue
Baltimore, MD 21218

RE: MUR 1158

Dear Mrs. Sahyoun:

Enclosed please find a check for $35 made payable to you pursuant to 11 C.F.R. § 111.14 for witness fees and mileage for your appearance for deposition on July 9, 1981.

The Commission appreciates your cooperation in this matter. If you have any questions please contact me at (202) 523-4000.

Sincerely,

Robert I. Bogin
Attorney

Enclosure

Witness Fee Check

3 0 1 0 3 7 1 7 2

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 35,200,545
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER • • REQUIRE IDENTIFICATION

United States Treasury 15-51 / 000

PAY TO THE ORDER OF DIANA SAYOUN

DOLLARS	CTS.
$****35	00

MON.	DAY	YEAR
06	18	84

95755061

F E C
WASH DC
W1243

FE1AW432 WITNESS FEE
MUR 1158

"3001 1" "000000518" 35200545"

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1981

William Hayden
2600 Round Rd. Apt. B-3
Baltimore, MD 21225

RE: MUR 1158

Dear Mr. Hayden:

Enclosed please find a check for $35 made payable to you pursuant to 11 C.F.R. § 111.14 for witness fees and mileage for your appearance for deposition on July 9, 1981.

The Commission appreciates your cooperation in this matter. If you have any questions please contact me at (202) 523-4000.

Sincerely,

Robert I. Bogin
Attorney

Enclosure

Witness Fee Check

3 0 1 0 3 7 1 7 5

William Hayden
2600 Round Rd. Apt. B-3
Baltimore, MD 21225

RE: MUR 1158

Dear Mr. Hayden:

Enclosed please find a check for $35 made payable to you pursuant to 11 C.F.R. § 111.14 for witness fees and mileage for your appearance for deposition on July 9, 1981.

The Commission appreciates your cooperation in this matter. If you have any questions please contact me at (202) 523-4000.

Sincerely,

Robert I. Bogin
Attorney

Enclosure

Witness Fee Check

FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 35,200,548
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . REQUIRE IDENTIFICATION

United States Treasury 15-51 000

PAY TO THE ORDER OF WILLIAM HAYDEN

DOLLARS	CTS.
$***35	00

MONTH	DAY	YEAR
06	18	81

95350091

F E C
WASH DC
W1243

FE1AW432 WITNESS FEE
MUR 1158

⑈30041⑈ ⑆000000518⑆ 35200548⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1981

David B. Mitchell, Esquire
Mitchell & Lee
201 North Charles Street
Suite 810
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

Pursuant to your request, please find enclosed a copy of your client Robert Robinson's letter requesting the Commission to quash its subpoena. The Commission will review Dr. Robinson's motion to quash as well as the motion filed by Steven Worm, Belinda de Grazia and Vivien Raney this week. The Commission will notify you of the disposition of these motions.

If you have any questions, please call me at (202) 523-4000.

Sincerely,

Robert Bogin

Robert Bogin
Attorney
Federal Election Commission

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David B. Mitchell, Esquire
Mitchell & Lee
201 North Charles Street
Suite 810
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Mitchell:

Pursuant to your request, please find enclosed a copy of your client Robert Robinson's letter requesting the Commission to quash its subpoena. The Commission will review Dr. Robinson's motion to quash as well as the motion filed by Steven Worm, Belinda de Grazia and Vivien Raney this week. The Commission will notify you of the disposition of these motions.

If you have any questions, please call me at (202) 523-4000.

Sincerely,

Robert Bogin

Robert Bogin
Attorney
Federal Election Commission

Enclosure

1 3 0 4 0 3 7 1 7 7

81 JUL 7 P1:04

GCC# 5024

314 Broxton Road
Baltimore, Md. 21212
July 3, 1981

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1158

Gentlemen:

I received your subpoena asking me to appear for a deposition, apparently concerning contributions to the presidential campaign of Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called representatives of Citizens for LaRouche here in Baltimore to find out what this was about although I don't know whether this constitutes making the matter "public". Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed. I believe I gave my contribution legally.

I understand that extensive depositions concerning this matter have already been taken and that Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. Furthermore, I have been told that the General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. Therefore I request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I should believe, will remove any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Robert A. Robinson

Robert A. Robinson, M.D.

Not Fec

81.

RECEIVED BY FCC MAIL BRANCH ON F.C.C. JUL 6 1981

81 JUL 9 P12:: 5

GCC #5029

F
FEDCOMCOMM WSH 81 JUL 0 P1:09

WU INFOMASTER 1-012711 C184 07/03/81
ICS IPMMGWF WSH
05381 07-03 0332P EDT
TWX 7108220160 FEDCOMCOMM WSH
4-031570S184 07/03/81
ICS IPMMTZZ CSP
3017647226 TDMT BALTIMORE MD 17 07-03 0227P EST
PMS JOHN W MCGARRY, CHAIRMAN, DLR
FEDERAL ELECTION COMMISSION 1325 K ST NORTWEST
WASHINGTON DC 20463
PLEASE TAKE NOTICE I HAVE MOVED TO QUASH THE SUBPOENA ISSUED TO ME.
CERTIFIED LETTER TO FOLLOW
DR ROBERT ROBINSON VIVIEN RANEY BELINDA DEGRAZIA STEVEN WARM

1429 EST

1435 EST

FEDCOMCOMM WSH

1981 JUL 4 AM 9 C3

FOB MAIL BRANCH

81 JUL 10 AM 11:42

81 JUL

RE

GCC#5038

MITCHELL & LEE, P.A.
Attorneys and Counsellors at Law
Suite 810, Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

David B. Mitchell
Charles Curtis Lee
(1945-1978)

Robert L. Bloom
Elizabeth L. Julian*
George E. Tindal

*Admitted in Pa. also

Area Code 301
837-5559

JUL 10 AM 11 41

July 9, 1981

Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 1158

Dear Mr. Bogin:

This letter is in accord with our telephone conference of July 8, 1981, regarding the above investigation. I have been retained by Robert A. Robinson,M.D., Mrs. Flora Hurley, Steven G. Warm, M's Vivien Raney and M's Belinda F. deGrazia, in connection with the subpoenas issued to them. Please note my appearance for them in your records.

Their individual initial appearances were to begin on Thursday, July 9, at 4:30 p.m., with M's Raney and continuing at intervals for the rest of Friday, July 10. I request a postponement of those appearances to allow me the opportunity to review the proceedings. You and I have tentatively agreed to a rescheduling for Thursday, July 16, with the time yet unset. It is my understanding that they will be required to appear at the offices of the U.S. Attorney for Maryland, 8th floor, Federal Courthouse, 101 W. Lombard Street, Balto., Md. 21201. We will work out the times soon so that I can advise the several witnesses accordingly.

Very truly yours,

MITCHELL AND LEE, P.A.

DAVID B. MITCHELL

DBM/rg

MITCHELL & LEE, P.A.
Attorneys and Counsellors at Law
Suite 810, Central Savings Bank Building
201 North Charles Street
Baltimore, Maryland 21201

HAND DELIVERED

Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

MUR 1158
GC #5039

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

11 JUL 10 A9:00

MEMORANDUM

TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/LENA STAFFORD

DATE: JULY 9, 1981

SUBJECT: TELEGRAM REGARDING SUBPOENA - ROBINSON, etc.

The attached wire was received in the Office of the Commission Secretary at 1:09 p.m. on July 9, 1981. It is being forwarded to your office for your attention.

GCR H 5068

RECEIVED
81 JUL15 P1:06

July 7, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

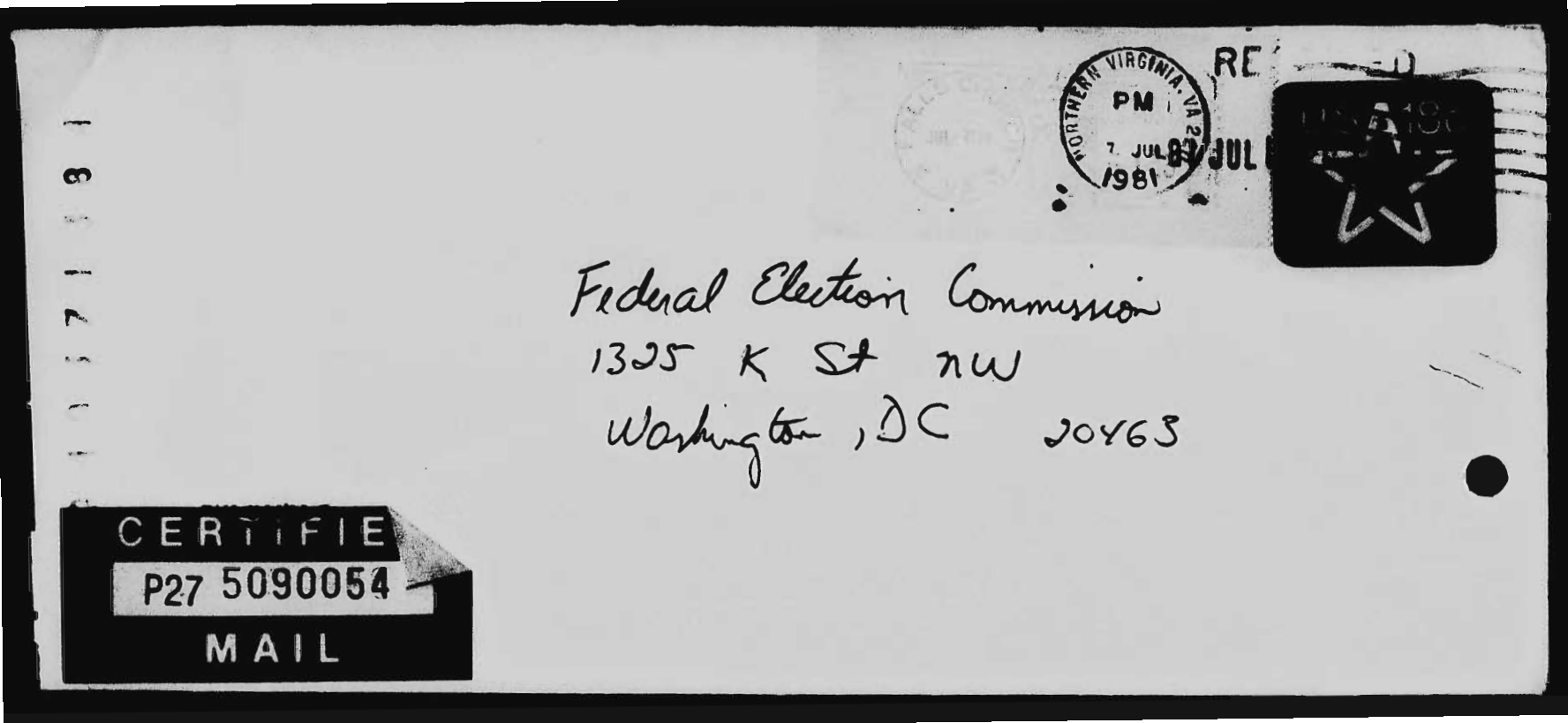
I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,
Flora F. Hurley

Mrs. Flora Hurley


NORTHERN VIRGINIA, VA
PM
7 JUL
1981
RE
JUL
Federal Election Commission
1325 K St nw
Washington, DC 20463
CERTIFIE
P27 5090054
MAIL

RECEIVED
101057 MORRIS
81 JUL 10 A11:53
GCC#5045

July 7, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

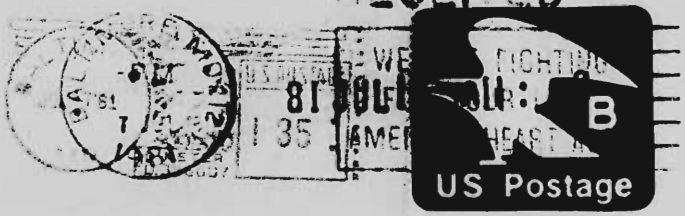
Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Belinda Frances deGrazia

Belinda Frances deGrazia

B F deGrazia
4 E 52nd ST Apt 10B
Boston MA 02118



RETURN RECEIPT REQUESTED

CERTIFIED
P33 5642976
MAIL

Federal Electron Commun
1325 K ST NW
Washington DC 20463

RECEIVED
058 G CC#5046
81 JUL 10 AM : 53

July 3, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Steven G. Warm

Steven G. Warm

Steven G. Warm
116 W. University Parkway
Apt. 1108
Baltimore, Md. 21210



Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

RETURN RECEIPT REQUESTED

CERTIFIED
P19 9040809
MAIL

83040371 83

1059 RECEIVED
FEC #5048
81 JUL 10 AM : 52
MURL158

July 2, 1981

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Certified Mail, return receipt requested

Gentlemen:

I received your subpoena asking me to appear for deposition, apparently concerning contributions to Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called Citizens for LaRouche representatives to find our what this was about although I don't know whether this constitutes making the matter "public." Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed on the grounds that it represents pure political harassment. I gave my contributions legally. I understand that extensive depositions concerning this matter have already been taken. Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. The General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. I hereby request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I am sure, will obviate any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary, wild campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Vivien Raney

Vivien Raney

Vivien Raney

1324 S. Charles St.
Baltimore, Md. 21230



RETURN RECEIPT
REQUESTED

Federal Election Commission
1325 K St. NW
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Constantine Philios
Sweet Air Road
Baldwin, Maryland

RE: MUR 1158

Dear Ms. Philios:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RTB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Constantine Philios
Sweet Air Road
Baldwin, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 3:00 p.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rustom Ghandi
4 Mars Road
Baltimore, MD 21221

RE: MUR 1158

Dear Mr. Ghandi:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

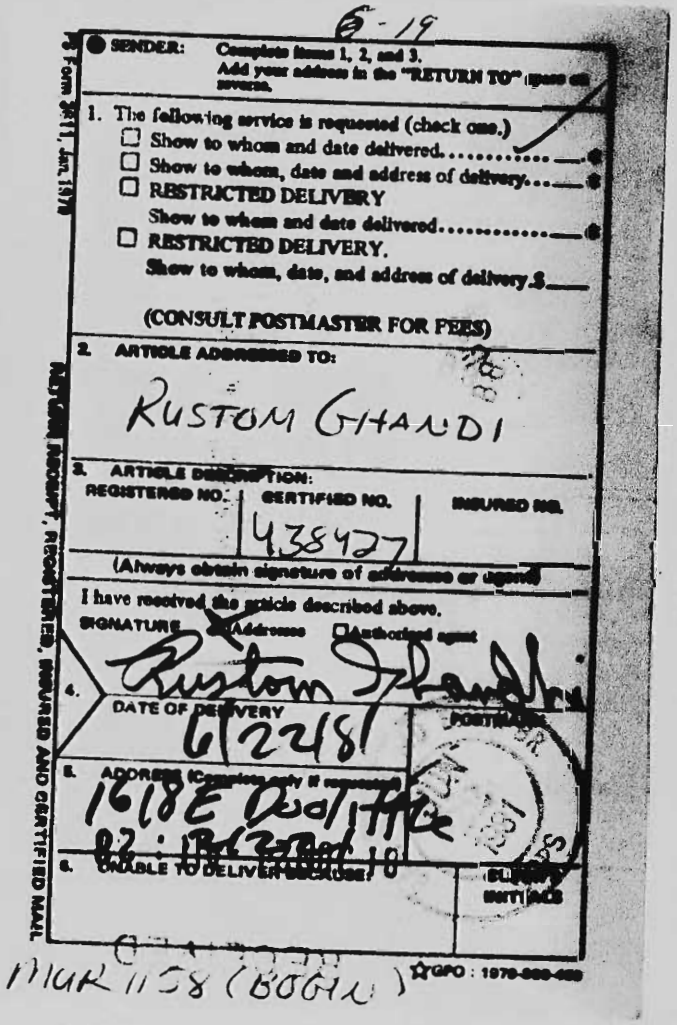
If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

6-19



PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery.....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

RUSTOM GHANDI

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438427	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Rustom Ghandi

4. DATE OF DELIVERY 6 2 78

POSTMARK

5. ADDRESS (Complete only if requested)

1618 E Dot Ave

6. UNABLE TO DELIVER BECAUSE:

STAMP

MUR 1158 (BOGH)

☆GPO : 1979-289-369

INSURED, RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

9 1 1 7 3 1 0 0 2 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rustom Ghandi
4 Mars Road
Baltimore, MD 21221

RE: MUR 1158

Dear Mr. Ghandi:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Rustom Ghandi
4 Mars Road
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 2:15 p.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert A. Robinson
314 Broxton St.
Baltimore, MD 21212

RE: MUR 1158

Dear Mr. Robinson:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

5-19

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

ROBERT A. ROBINSON

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438428	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

4. Beatrice C. Robinson

DATE OF DELIVERY 6/22/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

JUN 29 A9:4

JUN 1981

P.S. Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-289-488

MUK 1158 (ROBIN)

438428 23

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert A. Robinson
314 Broxton St.
Baltimore, MD 21212

RE: MUR 1158

Dear Mr. Robinson:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Robert A. Robinson
314 Broxton Street
Baltimore, Maryland 21212

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at noon on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Belinda F. deGrazia
310 Ridgemede Rd.
Baltimore, MD

RE: MUR 1158

Dear Ms. deGrazia:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

5-19

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☒ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery.....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

BELINDA F. deGRAZIA

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	Y38429	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☒Authorized agent

M.D. yatt

4. DATE OF DELIVERY: 6/5/84

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: 18

CLERK'S INITIALS

☆GPO : 1979-289-488

MUR 1158 (Both)

Y38429710

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Belinda F. deGrazia
310 Ridgemede Rd.
Baltimore, MD

RE: MUR 1158

Dear Ms. deGrazia:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Belinda F. deGrazia
310 Ridgemede Road
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 11:15 a.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steven G. Warm
310 Ridgemede Rd.
Baltimore, MD

RE: MUR 1158

Dear Mr. Warm:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

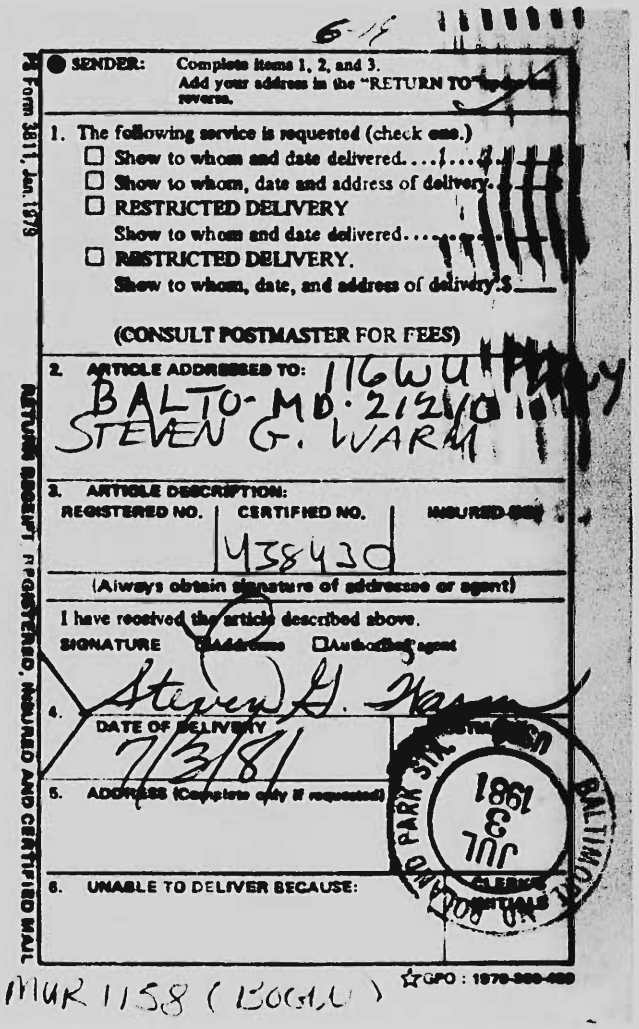
You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena



6-15

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

PS Form 3811, Jan. 1979

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered....
- ☐ Show to whom, date and address of delivery....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: 116 W U Pkwy
BALTO-MD-21210
STEVEN G. WARM

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
438430

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Steven G. Warm

4. DATE OF DELIVERY 7/31/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

BOARD OF PARK STA. JUL 31 1981 BALTIMORE MD CLERK

☆GPO : 1979-300-488

MUR 1158 (BOGLE)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steven G. Warm
310 Ridgemede Rd.
Baltimore, MD

RE: MUR 1158

Dear Mr. Warm:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Steven G. Warm
310 Ridgemede Road
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 10:30 a.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Salisbury
3205 Abell Ave.
Baltimore, MD

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Salisbury
3205 Abell Ave.
Baltimore, MD

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: William Salisbury
3205 Abell Avenue
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 9:45 a.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vivien Raney
1324 S. Charles St.
Baltimore, MD 21230

RE: MUR 1158

Dear Ms. Raney:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vivien Raney
1324 S. Charles St.
Baltimore, MD 21230

RE: MUR 1158

Dear Ms. Raney:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Vivien Raney
1324 S. Charles St.
Baltimore, Maryland 21230

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 4:30 p.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Diane Philios
Sweet Air Road
Baldwin, MD

RE: MUR 1158

Dear Ms. Philios:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

POSTAGE AND FEES PAID

Edward St. John
Harper House
Baltimore, MD 21210

87

CERTIFIED

43381

5-19

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery.... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

EDWARD ST. JOHN

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438411	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆GPO : 1979-300-468

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

23 JUN 1981 PM

MUR 1158 (Rogers)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

RETURNED TO WRITER
REASON CHECKED
Unclaimed
Addressee

POSTAGE AND FEES PAID

Diane Phillos
Sweet Air Road
Baldwin, Maryland

#7

2/10/3

87

CERTIFIED

438406

5-19

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $
- (CONSULT POSTMASTER FOR FEES) 80

2. ARTICLE ADDRESSED TO:

DIANE PHILIOS

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438906	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆GPO : 1979-300-450

MUR 1158 (BOGIN)

ECTION COMMISSION
N, D.C. 20463

POSTAGE AND FEES PAID

U.S. MAIL

ss
ate Use $300

CLAIM CHECK NO.
500685

☐ HOLD

DATE
4/25/81
1ST NOTICE

2ND NOTICE

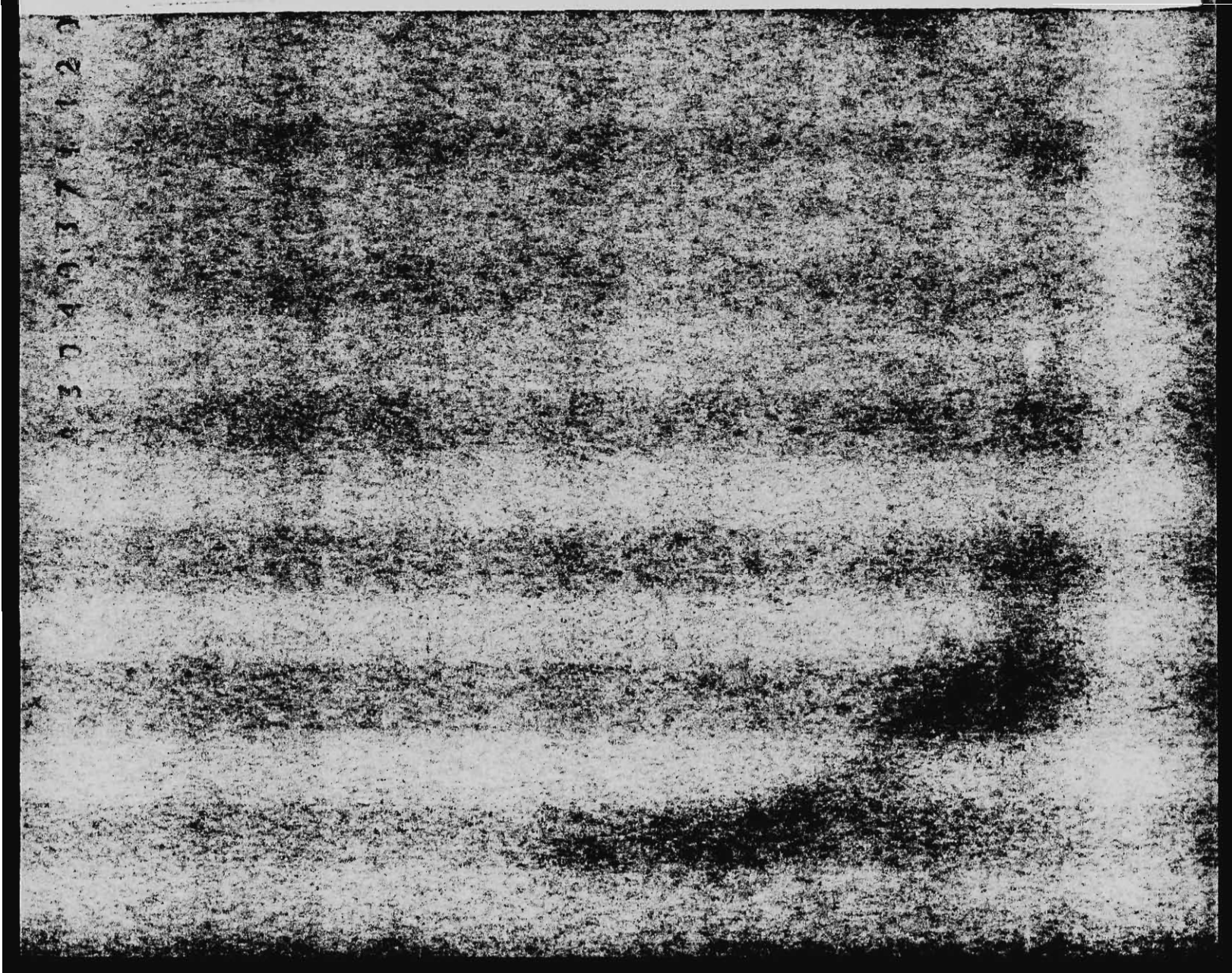
RETURN

Detached from
PS Form 3849—A
Oct 1980

PS

William Salisbury
3205 Abell Avenue
Baltimore, Maryland

CERTIFIED 4/24/81
P.C.
43843



5-19

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery. ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

WILLIAM SALISBURY

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	43843	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1978-800-488

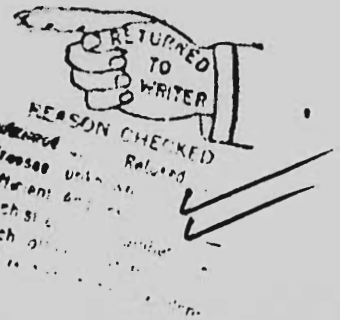
THUR 1158 (BOGIN)

C-24-81 returned

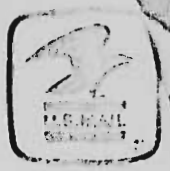
AL ELECTION COMMISSION
NGTON, D.C. 20463

Business

For Private Use $300



POSTAGE AND FEES PAID



Constantine Philios
Sweet Air Road
Baldwin, Maryland

CERTIFIED

438426

6

5-19

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

CONSTANTINE PHILIOS

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	V35426	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811, Jan. 1979

☆GPO : 1979-300-469

INVR 1158 (BOOK)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Flora Hurley
4615 Dustin Road
Burtonsville, MD 20730

RE: MUR 1158

Dear Ms. Hurley:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

5-19

PS Form 3811, Jan. 1973

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery.....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Flora Hurley

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	938403	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
M. C. Hurley

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
JUN 27 1981
81 JUN 29 P12:18

CLERK'S INITIALS

☆GPO : 1979-289-408

MUR 1158 (Begin)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Flora Hurley
4615 Dustin Road
Burtonsville, MD 20730

RE: MUR 1158

Dear Ms. Hurley:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Flora Hurley
4615 Dustin Road
Burtonsville, MD 20730

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 4:30 p.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Parthemos
514 S. Oldham Street
Baltimore, Maryland

RE: MUR 1158

Dear Mr. Parthemos:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Parthemos
514 S. Oldham Street
Baltimore, Maryland

RE: MUR 1158

Dear Mr. Parthemos:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: James Parthemos
514 S. Oldham Street
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 3:45 p.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Constantine Philios
Sweet Air Road
Baldwin, Maryland

RE: MUR 1158

Dear Ms. Philios:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

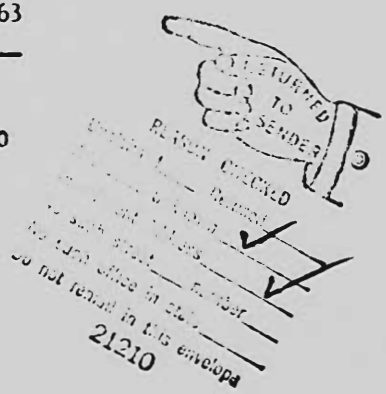
Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300



POSTAGE AND FEES PAID

U.S.MAIL

Mary Cavanaugh
Village of Crosskey
Baltimore, Maryland

138415

5-19

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ___¢
- ☐ Show to whom, date and address of delivery.... ___¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ___¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mary CAVANAUGH

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438415	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

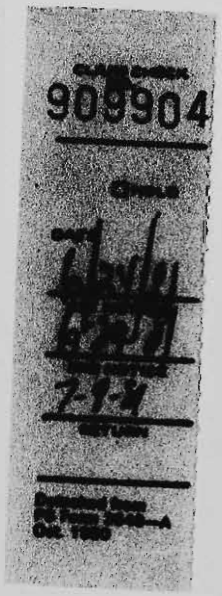
☆GPO : 1979-300-469

MLK 1158 (130gm)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

87



POSTAGE AND FEES PAID

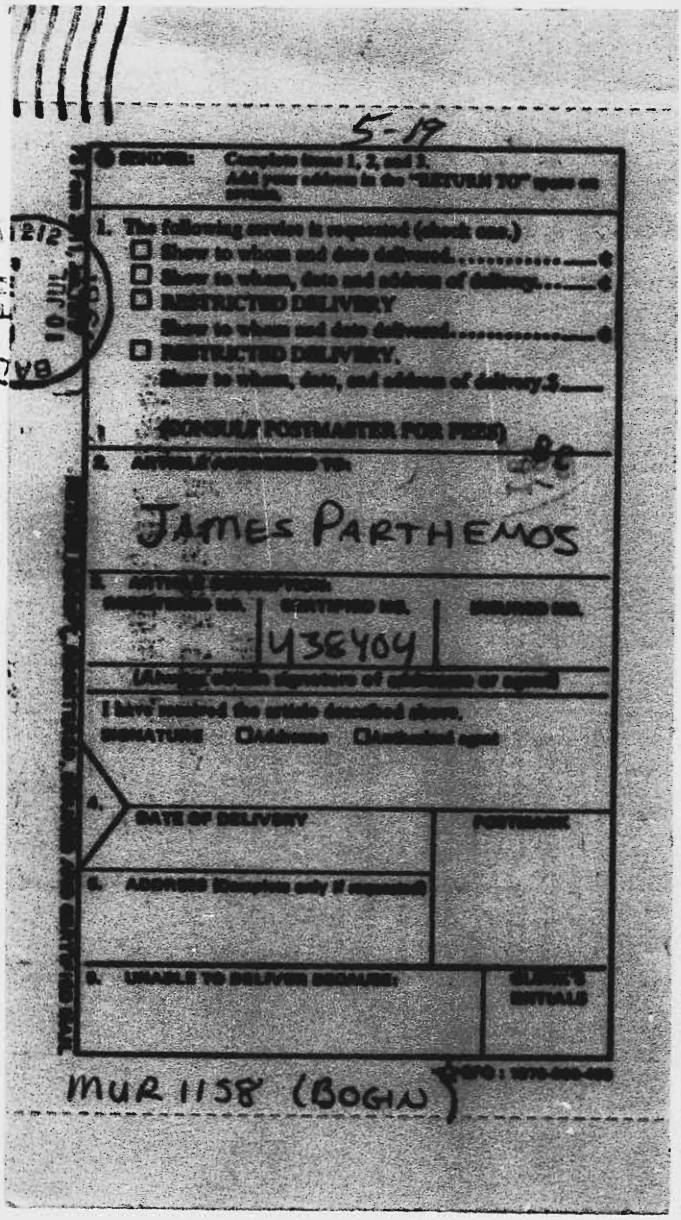
REASON CHECKED
Unclaimed Refused
Addressee unknown
Insufficient Address
No such street number
No such office in state
Do not remain in this envelope
21224

REASON CHECKED
Refused
No such office in state
Do not remain in this envelope
21224

James Parthemos
514 S. Oldham Street
Baltimore, Maryland

CERTIFIED

438404


5-19
SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.
1. The following service is requested (check one.)
Show to whom and date delivered
Show to whom, date and address of delivery
RESTRICTED DELIVERY
Show to whom and date delivered
RESTRICTED DELIVERY.
Show to whom, date, and address of delivery $
(POSTAGE AND FEES PAID)
2. ARTICLE ADDRESSED TO:
JAMES PARTHEMOS
3. ARTICLE NUMBER
REGISTERED NO.
CERTIFIED NO.
INSURED NO.
436404
(ALWAYS OBTAIN SIGNATURE OF ADDRESSEE OR AGENT)
I have received the article described above.
SIGNATURE
Addressee
Authorized agent
4. DATE OF DELIVERY
POSTMARK
5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS
10 JUL
BALTIMORE MD
MUR 1138 (BOGIN)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

[redacted]

87

RETURNED TO SENDER
UNCLAIMED
[redacted]

Walter [redacted]
Peach Bl[redacted] State
Easton, [redacted] 21601

4655 Pebble Bay South
Vero Beach, Fl. 32960

C-13

[redacted]IED

438410



5-19

Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date and address of delivery...¢
- ☐ RESTRICTED DELIVERY
- ☐ Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
- ☐ Show to whom, date, and address of delivery $

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

WALTER M. TAYLOR

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438410	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

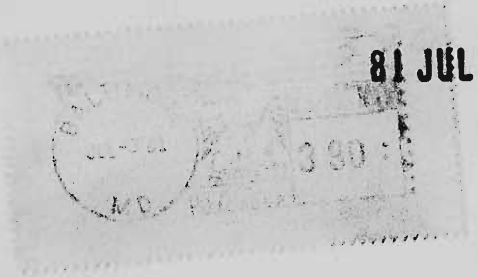
6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

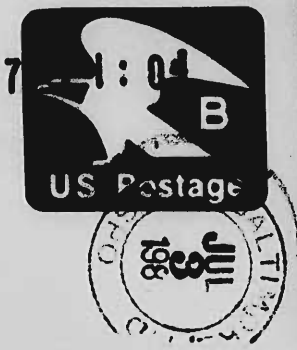
☆GPO : 1979-289-538

MUR 1158 (Bogin)

Robert A. Robinson, M.D.
314 Broxton Road
Baltimore, MD 21212

RECEIVED
81 JUL 7 [illegible] : 04





RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REGISTERED
NO. 73248

FED[illegible]AL ELECTION COMMISSION
[illegible]GTON,D.C. 20463

[illegible]usiness
[illegible]y for Private Use $300

POSTAGE AND FEES PAID

UNCLAIMED

HSS Augusta
21229

Arthur Murphy
[illegible]205 Abell Avenue
Baltimore, Maryland

RETURNED TO SENDER
REASON DESIRED
Unclaimed ___ Refused ___
Addressee with own ___
No such street ___ number ___
No such office in state ___
Do not remail in this envelope

FINA

CERTIFIED

438412

Returned 7-27-81

5-19

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date and address of delivery.....¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____

(CONSULT POSTMASTER FOR FEE)

2. ARTICLE ADDRESSED TO:

ARTHUR MURPHY
115 S. AUGUSTA AVE. ZIZZ

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	43841?	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆GPO : 1979-300-000

MUR 1158 (Begin)

RECEIVED

81 JUL 7 P1:04

GCC# 5024

314 Broxton Road
Baltimore, Md. 21212
July 3, 1981

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1158

Gentlemen:

I received your subpoena asking me to appear for a deposition, apparently concerning contributions to the presidential campaign of Lyndon LaRouche. The subpoena states that I should not make this matter public, although I may be represented by an attorney or I may call the FEC about questions I might have. Rather than calling the FEC who issued the subpoena in the first place or spending the money to hire my own attorney, I called representatives of Citizens for LaRouche here in Baltimore to find out what this was about although I don't know whether this constitutes making the matter "public". Citizens for LaRouche told me that I could move to quash the subpoena before the Federal Election Commission. Your subpoena nowhere informed me of this right although I understand from Citizens for LaRouche that my time for doing so may have lapsed.

I hereby move to quash the subpoena before the Federal Election Commission and for a special extension of the time in which to do so if that time has lapsed. I believe I gave my contribution legally.

I understand that extensive depositions concerning this matter have already been taken and that Citizens for LaRouche and Debra Hanania Freeman have responded in all respects and therefore the Commission has all the relevant facts before it. Furthermore, I have been told that the General Counsel's office has refused repeated requests to conciliate the situation even with all the relevant facts before it. Therefore I request that the Commission examine the record in this matter before ruling on the motion to quash. Such an examination, I should believe, will remove any lingering doubts as to the necessity of further examinations and aid the Commission in developing appropriate sanctions against the General Counsel's office which appears bent on an arbitrary campaign of harassment of individual citizens who contributed to Lyndon LaRouche.

Please inform me promptly by letter of the Federal Election Commission's action.

Sincerely,

Robert A. Robinson

Robert A. Robinson, M.D.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Diane Philios
Sweet Air Road
Baldwin, MD

RE: MUR 1158

Dear Ms. Philios:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Diane Philios
Sweet Air Road
Baldwin, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 3:00 p.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Hallmen
2077 Old Westminister Pike
Sandymount, MD

RE: MUR 1158

Dear Mr. Hallmen:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

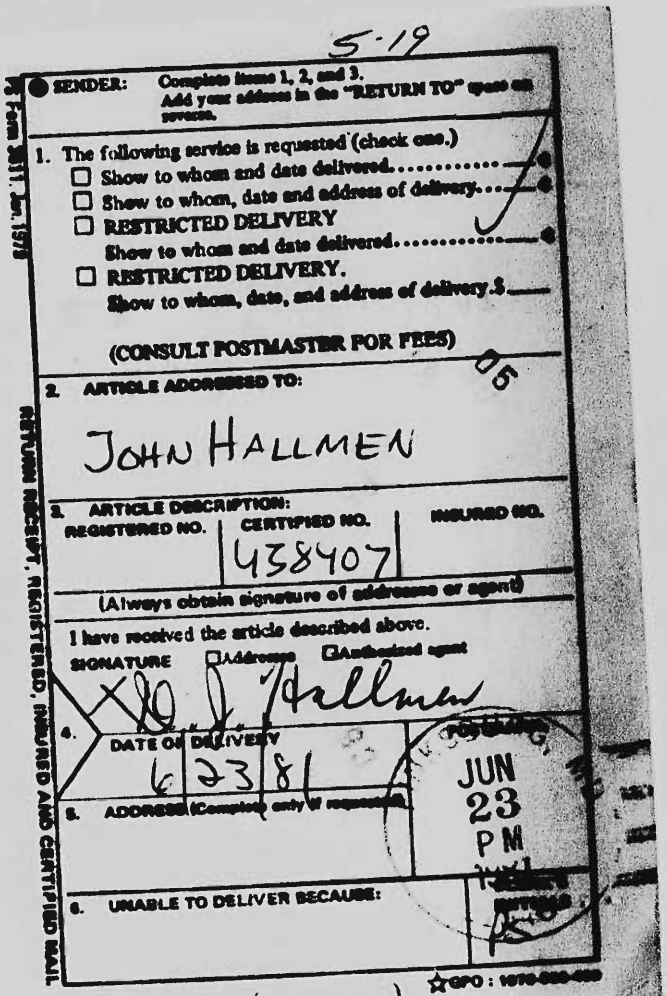
If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

5-19



SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: 05

JOHN HALLMEN

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438407	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

X John J. Hallmen

4. DATE OF DELIVERY: 6 23 81

POSTMARK: JUN 23 PM

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

P.S. Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-

MUR 1158 (BOGLI)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Hallmen
2077 Old Westminister Pike
Sandymount, MD

RE: MUR 1158

Dear Mr. Hallmen:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: John Hallmen
2077 Old Westminister Pike
Sandymount, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 2:15 p.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Hayden
2600 Round Rd. Apt. B-3
Baltimore, MD

RE: MUR 1158

Dear Mr. Hayden:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Hayden
2600 Round Rd. Apt. B-3
Baltimore, MD

RE: MUR 1158

Dear Mr. Hayden:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: William Hayden
2600 Round Rd. Apt. B-3
Baltimore, Maryland

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at noon on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melanie Miscall
P.O. Box 1423
Easton, MD 21601

RE: MUR 1158

Dear Ms. Miscall:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

6-19 ✓

P.S. Form 3811, Jan. 1979 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
MELANIE MISCALL

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438409	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY
JUN 22 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

EAST POSTMARK JUN 22 1981 USPO

☆GPO : 1979-606-469

MUR 1158 (Bogen)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melanie Miscall
P.O. Box 1423
Easton, MD 21601

RE: MUR 1158

Dear Ms. Miscall:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Melanie Miscall
P.O. Box 1423
Easton, MD 21601

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 11:15 a.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter M. Taylor
Peach Blossom Estate
Easton, MD 21601

RE: MUR 1158

Dear Mr. Taylor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter M. Taylor
Peach Blossom Estate
Easton, MD 21601

RE: MUR 1158

Dear Mr. Taylor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Walter M. Taylor
Peach Blossom Estate
Easton, MD 21601

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 10:30 a.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward St. John
Harper House
Baltimore, MD 21210

RE: MUR 1158

Dear Mr. St. John:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward St. John
Harper House
Baltimore, MD 21210

RE: MUR 1158

Dear Mr. St. John:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Edward St. John
Harper House
Baltimore, MD 21210

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 9:00 a.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Murphy
3205 Abell Ave.
Baltimore, MD

RE: MUR 1158

Dear Mr. Murphy:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Murphy
3205 Abell Ave.
Baltimore, MD

RE: MUR 1158

Dear Mr. Murphy:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RP

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Arthur Murphy
3205 Abell Ave.
Baltimore, MD

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 9:45 a.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Diana Sayoun
613 St. Anne Avenue
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Sayoun:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Diana Sayoun
613 St. Anne Avenue
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Sayoun:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Diana Sayoun
613 St. Anne Avenue
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 3:45 p.m. on July 9, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary Cavanaugh
Village of Crosskey
Baltimore, MD

RE: MUR 1158

Dear Ms. Cavanaugh:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary Cavanaugh
Village of Crosskey
Baltimore, MD

RE: MUR 1158

Dear Ms. Cavanaugh:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

RB 6/18/

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Mary Cavanaugh
Village of Crosskey
Baltimore, MD

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St., Baltimore, Maryland, at 9:00 a.m. on July 10, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158 with regard to contributions to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 18th day of June 1981.

John W. McGarry, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JUNE 18, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1158

The attached subpoenas regarding MUR 1158, which were Commission approved on June 11, 1981 by a vote of 6-0, have been signed and sealed this date.

Attachments:
Subpoenas (18)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1158
Citizens for LaRouche)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 11, 1981, the Commission approved by a vote of 6-0 the General Counsel's recommendation to authorize the issuance of subpoenas to the following in MUR 1158:

Flora Hurley
James Parthemos
Constantine Philios
Rustom Ghandi
Robert A. Robinson
Belinda F. deGrazia
Steven G. Warm
William Salisbury
Mary Cavanaugh
Vivien Raney
Diana Sayoun
Diane Philios
John Hallmen
William Hayden
Melanie Miscall
Walter M. Taylor
Arthur Murphy
Edward St. John

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

6/11/81
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 6-8-81, 3:54
Circulated on 48 hour vote basis: 6-9-81, 11:00

June 8, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1158

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Bogin

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 JUN 8 P3:54

June 8, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Authorization to Issue Subpoena in Connection with MUR 1158 (80)

Attached for Commission approval are deposition subpoenas directed to various individuals whose purported contributions submitted by Citizens for LaRouche for matching funds raise questions as to their validity to be matched. Money orders in the name of John Hallmen, William Hayden, Diane Philios, Edward St. John, Rustom Ghandi, Arthur Murphy, Constantine Philios, James Parthemos, Robert Robinson, Belinda de Grazia, Steven G. Warm, William Salisbury and Mary Cavanaugh, based on a preliminary review of the handwriting, demonstrate the same pattern of irregularity found in previous money orders analyzed in this matter under review.

Checks written by Melanie Miscall and Walter M. Taylor appear to have identical handwriting including the signature line. The deposition of Diana Sayoun is necessary to confirm her contribution to CFL evidenced by a third party check made payable to her husband David Sanders. Documentation accompanying the contribution attributed one half of the contribution to his wife, Lenore. Testimony by David Sanders did not adequately explain this discrepancy.

Flora Hurley and Vivien Raney are selected for depositions because their checks submitted as contributions include notations that may indicate that their checks were payments for subscriptions and various publications. Questions thus arise as to whether these payments should be construed to be contributions properly matchable.

Recommendation

Authorize the following subpoenas:

Flora Hurley
James Parthemos
Constantine Philios
Rustom Ghandi
Robert A. Robinson
Belinda F. deGrazia
Steven G. Warm
William Salisbury
Mary Cavanaugh
Vivien Raney
Diana Sayoun
Diane Philios
John Hallmen
William Hayden
Melanie Miscall
Walter M. Taylor
Arthur Murphy
Edward St. John

Attachments

Authorization Form
Sample Subpoena and cover letter.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

S A M P L E L E T T E R

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 1158

Dear

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorize the issuance of subpoenas to the following people in connection with MUR 1158:

Flora Hurley
4615 Dustin Road
Burtonsville, MD 20730

James Parthemos
514 S. Oldham Street
Baltimore, Maryland

Constantine Philios
Sweet Air Road
Baldwin, Maryland

Rustom Ghandi
4 Mars Road
Baltimore, MD 21221

Robert A. Robinson
314 Broxton St
Baltimore, MD 21212

Belinda F. deGrazia
310 Ridgemede Rd
Baltimore, MD

Steven G. Warm
310 Ridgemede Rd
Baltimore, MD

William Salisbury
3205 Abell Ave
Baltimore, MD

Mary Cavanaugh
Village of Grosskup
Baltimore, MD

Vivien Raney
1324 S. Charles St.
Baltimore, MD 21230

Diana Sayoun
613 St. Huus Avenue
Baltimore, MD 21218

Diane Philios
Sweet Air Road
Baldwin, MD

John Hallmen
2077 Old Westminister Pike
Sandymount, MD

William Hayden
2600 Round Rd Apt. B-3
Baltimore, MD

Melanie Miscall
P.O. Box 1423
Easton, MD 21601

Walter M. Taylor
Peach Blossom Estate
Easton, MD 21601

Arthur Murphy
3205 Abell Ave
Baltimore, MD

Edward St. John
Harper House
Baltimore, MD 21210

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

S A M P L E

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO:

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at _____ _____ Baltimore, Maryland. at _____ a.m./p.m. on _____ and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Robert Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the ___ day of June 1981.

_____
John W. McGarry, Chairman
Federal Election Commission

ATTEST:

_____
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 28, 1981

MEMORANDUM

TO: The File

FROM: Beverly Kramer

SUBJECT: MUR 1158

Pursuant to the Commission's directive of August 8, 1980, the Audit Division analyzed the entire CFL submission with respect to money orders and cashiers checks. In addition, the Audit Division performed a 100% review of CFL contributions in the threshold states of Maryland, Virginia, Ohio, Oregon, and Missouri. The findings of the Audit Division were referred to the Office of General Counsel in a February 27, 1981 memorandum entitled "Citizens For LaRouche - Matching Funds Submissions."

Based on the General Counsel's review of the audit findings, we have determined to incorporate the attached exhibits into MUR 1158.

MARYLAND MONEY ORDERS

Exhibit Number	Contributor - Occupation	Issuing Institution	Serial Number	Date of Instrument	Amount	Amount Applied Towards Eligibility
	Anne Taylor - 1/	American Express	55-466-938-411	11-21-79	$150.00	N/A
J(1)	Arthur Murphy - Student	American Express	55-466-938-416	11-21-79	100.00	N/A
	Ernest Pulsifor - 2/	American Express	55-466-938-424	11-21-79	150.00	N/A
	David Sanders - 3/	American Express	55-467-316-467	01-08-80	25.00	N/A
J(2)	William Hayden - Unknown	American Express	55-467-316-478	01-08-80	35.00	N/A
	Robert Primack - 4/	American Express	55-467-316-494	01-08-80	50.00	N/A
J(3)	John Hallmen - Unknown	American Express	55-467-614-354	01-08-80	50.00	N/A
J(4)	Diane B. Philios - Housewife	Federal Express	119691495	Unknown	250.00	N/A
	Constantine Philios - 5/	Federal Express	119691496	Unknown	225.00	N/A

J(1), (2) and (3)

The style of handwriting which completed the payee line of the above three instruments bears, in some combination, several common characteristics and may have been completed by the same hand. The characteristics common to the instruments are:

- the "s" in Citizens is printed in the same style and often resembles the number 5. (Also noted in instrument J(4)).
- the "F" in For is always capitalized.
- the "r" in For is printed in a style that resembles the letter "v" (see A(5)(6)(7)(8) and (9)). (Also noted in instrument J(4)).
- the word LaRouche is nearly identical on the three instruments.

Three of the instruments (J(1),(2), and (3)) also exhibit serial number patterns and display a common place and time of purchase. It was also noted that part of the address (city) appearing on the money order from John Hallman (J(3)) varied from the address on the accompanying signed contributor statement (see Exhibit J(3)).

1/ through 5/ Contributors previously included in the February 6, 1980, referral of receipt irregularities and subsequently incorporated into MUR 1158. The money orders are included to display patterns of serial numbers and instrument dates. Other irregularities noted in the 2/6/80 referral have not been included.

Maryland Money Orders

J(4)

The style of handwriting completing this money order is similar to the handwriting irregularities appearing in other Maryland money orders which were referred to the Office of General Counsel on February 6, 1980, and included in MUR 1158. One of the contributors included in the referral was a Constantine Philios who appears to be related to this contributor. In addition to the common last name, both contributors reside at the same general address (Sweet Air Road). Further, the instrument referred (M/O# 119691496) and this instrument were purchased from the same issuing institution and consecutively numbered.

Exhibit J

AMERICAN EXPRESS MONEY ORDER

1020

55-466,938,416

PAY THE SUM OF
NOT GOOD OVER $250.

DATE 11/21 19 74 ONE HUNDRED DOLS 00 CTS

TO THE ORDER OF Citizens For LaRouche

Arthur Murphy 3205 Abell Ave.
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

CHAIRMAN

1:1020:0001:55 466938416 7

BALTIMORE

MD.

Exhibit J

1-15-80

DATE _____ DEPOSIT CODE _____

(2)

AMERICAN EXPRESS MONEY ORDER

55-157,315,478

PAY THE SUM OF
NOT GOOD OVER $200.

THE SUM OF 5 DOLLARS 00 CTS

DATE Jan 8 19 80

TO THE ORDER OF Citizens For LaRouche

William Hayden 2600 Round Rd Apt B-3 Balt Md

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

PAY William J. Hayden

⑆1020⑆0001455⑆467⑆647888⑈

0000

MD

⊗

EXHIBIT U

AMERICAN EXPRESS COMPANY
7035 WEST BRADLEY AVENUE
DENVER, COLORADO 80226
PURCHASER'S RECEIPT-FILL IN-KEEP FOR YOUR RECORD

AMOUNT _____ DATE _____

SENT TO _____

FOR _____
SEE AGREEMENT ON OTHER SIDE

AMERICAN EXPRESS MONEY ORDER

55-467,641,354

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 2/1 1980 THE SUM OF 50 DOLLARS 00 CTS

TO THE ORDER OF Citizens For LaRouche

CHAIRMAN

John Hallmen, 2077 Old Westminster Pike Sandymount
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

55-467,641,354 ⑈1020⑈000⑆55 ⑈467641354⑈

0008 MD

Dear Sirs:

I contributed the following:

AMOUNT: 50.00
DATE: 02/04/80

(3)

to Citizens for LaRouche. This was from my personal funds and was not drawn on an incorporated account.

signature

John S. Hallmen
printed name

2077 Old Westminster Pike
street address

Finksburg, MD
city, state zip

1-21-80 DATE _____ DEPOSIT CODE 1-1

Exhibit J

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Diane R. Philios
Address Sweet Air Rd.
City Baldwin State Md. Zip
Amt. of contribution 250
(If contribution is $100 or more fill out below)
Occupation housewife
Place of employment
Address

(4)

00003 MD

1-21-80 DATE _____ 1-1 DEPOSIT CODE _____

~~FEDERAL~~ EXPRESS MONEY ORDER

119691495 64.79/611

PAY THE ~~SUM OF~~ FEDERAL EXPRESS 250 DOLS 00 CTS

PAYABLE TO Citizens for Larouche NOT VALID OVER $500.00

FROM Diane R Philios - Diane B Philios

ADDRESS Sweet Air Rd. FEDERAL EXPRESS SERVICES CORP. DRAWER - DRAWEE

CITY Baldwin STATE Md. ZIP CODE _____ DATE _____

:0611007901: 119691495 74

1-21-80 DATE _____ 1-1 DEPOSIT CODE _____

GCC #4504

April 12, 1981

RECEIVED
81 APR 15 AM : 04

Dear Sir:

Enclosed you will find a 27-page document that indicates financial irregularities committed by Lyndon LaRouche during ~~the~~ his 1980 Presidential Campaign bid. They are startling in that LaRouche incriminates himself herein.

The documents were generated during the late 1980 faction fight, when LaRouche expelled the "Computron" computer software faction, including Axios, Tyszlador, Teitelbaum, & Roth, & Coleman.

This group around Axios (LaRouche's right hand man for 10 years and who not only knows where the financial skeletons are buried, but directed ~~from~~ their burial) feels beleaguered, ~~and~~ legally compromised and legally vulnerable. It includes Felice Merrit Colman, ~~Lafa~~ the former chairman of Committee to Elect Lyndon LaRouche President in 1980.

Verbum satis sapienti,

Simon Wiesenthal

My

Costas Kalimtgis Temporarily Incapacitated

Lyndon H. LaRouche, [redacted]
December 15, 1980

Because some members have been behaving as well-meaning damned fools, I have been forced to take an action I have been avoiding: to formalize Costas Kalimtgis's *temporary suspension* from executive duties, pending his recovery from a mental disassociation correlated with his recent and current condition of physical health.

I report as much of the hard fact as it is discreet to put into writing.

My first indication of a deterioration of Costas' mental condition came when he acted to collapse the European organization, and attempted to excuse that action by diversionary wild, insane libels against Uwe Friesecke, Helga, and the European organization generally.

My first reaction was to calm Costas down by telephone, assuming that that irrational outburst was simply a product of his overexertion under the unusual added stress of certain critical administrative problems. When the same mental aberation recurred, I moved into the situation. I had no inkling of the severity of the situation until Costas erupted in a psychotic-like episode during the course of a National Executive Committee meeting on the eve of the recent National Committee meeting.

The problem is simply that Costas is extremely ill and extremely disoriented, all as an outgrowth of the accumulated stress he has suffered since approximately September-October 1979.

Without going into privileged details of the matter, the Computron connection to Costas' problems is essentially as follows.

Computron Software is the leading minicomputer programming and software entity in the United States, and perhaps the world today. This success is significantly to the credit of the leadership that effort supplied by Andy Typaldos up into about September-October 1979. It is also the result of the dedication and sacrifices of talented Labor Committee members who have provided the firm with capabilities and dedication of a quality which no employer could have found otherwise.

The actions of the Eagle-Star-centered grouping of the Anglo-Canadian SOE crowd, attempting to ruin Computron by defamation and related methods of financial warfare, had a grave initial impact on software sales, although that has been reduced to a marginal problem over the course of 1980.

There has been serious mismanagement of Computron's affairs, a mismanagement whose reality has been covered over by exaggerated and sometimes downrightly mythological assumptions that the Labor Committees or the recent campaign were in some way the principal cause of Computron's difficulties.

The central point of the mismanagement is a wrong-headed belief, significantly nurtured by Costas and some others, that Andy is a "business magician." This illusion has resulted in incurring a large amount of non-software expense-burden for activities in which Andy was a sardine swimming among sharks. In other words, Andy was encouraged to go outside of the area of his specific competencies in business into areas in which he is essentially a fumbling amateur. As of this point, that is the only cause of Computron's recent and continuing problems. Without those grave policy-errors, Computron would not have suffered the recent difficulties in the form or severity with which they occurred.

(1)

This is coupled with the fact that a number of influential business groups have sought to help Computron expand its business and secure additional capital. These offers were made by capable persons who wished to help enterprises of my friends, and who have been most efficiently helpful in other matters. Acting under the influence of the illusion of great financial coups, Andy and other representatives of Computron made themselves ridiculous in the eyes of these business circles—each of whom has confided, independently of one another, the same general complaint of Andy's obsession with "moonbeams," rather than sticking to the sound business which Computron is.

The problem of mismanagement of the ICLC has been Costas' growing obsession with the delusion that Andy was about to pull off a financial miracle outside of regular Computron business. The national administration of the NCLC, most emphatically, was directed according to the delusion that everything had to be subordinated, and sacrificed if necessary, to the assumption that Andy was some sort of magician about to put over a world-resounding financial miracle.

In fact Andy's approach to the overseas and certain other promotions (outside Computron's specialized, extraordinary competence) had violated every sound principle in the book. This has continued in defiance of advice of experts with long, successful experiences in these areas, as well as my own direct advice to Andy and others in this matter.

Instead of pressing Andy to stop high-priced pursuit of moonbeams, and to get down to the business for which he had proven competence, Costas and others ran the organization's affairs on the assumption that Andy was a "world supermagician" whose outlook must be adopted as a model by the ICLC. Month after month, Computron's mismanagement of its extracurricular activities aggravated the problem. Inevitably, the enemy forces took advantage of this, and struck to produce the crisis.

It was not Computron's crisis which prompted Costas to choose to collapse the European organization. That latter decision was made weeks before the first warning of the crisis at Computron. The origin of the latter decision was the repeatedly-stated commitment to sacrifice anything for the pursuit of moonbeams.

Although most of the "international" and other extracurricular promotions were a mixture of incompetent judgment and outright delusions, there was one element of these extracurricular projects which had a certain soundness, if the project were approached in the right manner, and with the proper financial support *prior to* high-ticket expenditures on its account. I was to supply one of the crucial parts in a sound approach to this, a tactic which has not been followed through to the present date.

To remove cause for any simplistic misinterpretation of the facts: Computron was not the direct cause of the problems of the organization during the recent period. Rather, the problems of Computron are a mere predicate of a broader disorientation: the same mismanagement which has dominated Computron's extra-curricular ventures over the past period was introduced as a philosophy of gross mismanagement into the administrative and related affairs of the NCLC. Costas built Andy up in his own mind (and to some degree in Andy's mind as well) as a "world-class operative," and aggravated this by using Costas' deluded conception of Andy's stature as a "world-class operative" to impose what Costas imagined to be Andy's genius on the political and administrative management of the organization.

According to Costas' own report, as confirmed by others, sometime, not later than immediately following the New Hamp-

shire primary, Costas developed the "bug in his head" that the European organization was in some way responsible for various important difficulties of the organization as a whole—that Europe was somehow "disloyal" to the U.S.A. organization. What Costas recently described as his March 1980 hatred against Europe generally, and Helga in particular, is corroborated by some others to whom Costas confided this private view. The "bug in his head" was pure paranoia—especially to those of us who know Uwe Friesecke as the most outspoken American nationalist of Europe.

This "bug in his head" erupted overtly at the point he acted to collapse the European organization. When I remonstrated (by telephone) with him against collapsing the European organization, Costas replied with a paranoid litany about the disloyalty of the European organization as the reason for his actions. Later, in the psychotic-like outburst the night before the National Committee meeting, Costas came out into the open with a vile, slanderous, altogether lying attack against Helga ... the same Helga who, out of dedication to our efforts, endured, if sometimes restively, being kept in a virtual "cage" month after month as her duty to the U.S. campaign-effort.

This paranoid hostility against Europe was extended to the National Executive committee, and later against the National Committee broadly and to others. Increasingly, the attitude was that the members were merely plastic figures who were failing to fulfill their duty to serve business-like demands.

It is not so simple. On the one side, on many occasions, Costas continued to make correct observations about the political process. These were, in practice, increasingly lip-service. Not that Costas' sincerity is to be doubted: rather, whenever those political principles conflicted with the obsessive pursuit of moonbeams, it was the political organization which was instructed to suffer.

Immoral, yes. Costas of 1979 or earlier would have been the first to lead in condemning such immorality. Was Costas consciously immoral? I doubt it. To commit immoral acts, it was necessary for him to become almost insane, to hide reality from himself behind a screen of paranoid obsessions, to direct paranoid obsessions of hatred against those whom he was acting to injure. *It was divided loyalities which broke Costas.*

This was not Andy's fault. Andy knows almost nothing of real politics, has never organized politically, and tends to defend himself by deprecating political organizers as intellectually inferior to "successful businessmen." This problem is commonplace among those whose daily activity centers on the manipulative business of selling "important business executives." It is a classical psychological tendency among salesmen. This is aggravated by the fact that he has lately mistaken his special competencies in some aspects of business as evidence that he is a good businessman in general—which he is not.

The problem is that Andy became a mythological figure within Costas' growing fantasies. It is not the real, living, breathing Andy who dominates Costas' delusion, but a purely-mythological Andy within Costas' recently-developing fantasy-life. When Andy speaks, Costas does not hear the actual Andy: he views Andy as the incarnation of the fantasy-Andy who exists only in Costas' delusion. Thus, if the real-life Andy says something which is politically incompetent, or makes an obvious blunder, Costas takes this utterance as Olympian wisdom, as almost an infallible pronouncement.

Hence, when I responded to Costas' telephonic advice that the "Olympians" were killing Computron's sales, both Costas and Andy reacted with irrational rage. Costas' statement was broadly true, although—as I have subsequently discovered—not in exactly the way Costas presented it. The Olympians have reduced the directly aversive actions against Computron *sales* over the recent period. The problem has been the mismanagement aggravated by Andy's efforts to adapt to the psychologically-controlled environment of the Olympians who have been targetting his mind with knowledge of the weak points of his psycho-profile. He has been chasing a carrot around the world, a carrot which remains just close enough within reach to remain attractive to him.

Costas' role has been to feed Andy's misdirection, and to impose the mythology, the obsessions associated with that delusion on the organization generally.

The Mismanagement of the NCLC

Costas is no "devil," no "scapegoat." Others played their part in contributing to the obsessions causing the mismanagement of both Computron and the organization. Costas is simply a person whose mental balance broke under combined physical and psychological stresses. The problem has been the way various persons interacted with Costas' problems to institutionalize them.

Costas' problem should be isolated. A person who had become as a son to me has gone "bonkers" under stress. If well-meaning meddlers do not reenforce Costas' attachment to his delusions, he will probably recover. We have had some repeated experience with this sort of paranoid problem developed under stress. One must, in such cases, confront the victim of the paranoia with the truth in the most uncompromising way, and then provide a protected environment in which they will probably recover by their own means. Costas is a high-grade personality, after all, not a weak personality such as Bob Cohen or Eric Lerner. The prognosis is good, if well-meaning meddlers do not encourage Costas to cut himself off from his inner mooring to sanity, an inner mooring he locates essentially with me.

The task is to take the pressure away from Costas while isolating his problem. Bunglers and busy gossips have been worsening his condition after it had been significantly stabilized.

What do the bunglers wish to do? Make Costas anti-political, in order to make him non-political, more business-oriented? If you succeed in such bungling meddling, you will destroy him. Costas' entire identity is political; undermine that and you destroy him. That is precisely how the mythology invoiving a fantasy-image of "Andy and the world-class business operative" weakened Costas to the point this problem could have developed in the first place.

The "interesting problem" is the process of interactions which institutionalized the suicidal policies of mismanagement. The interesting thing is the way in which various circumstances and persons fed the problem, reenforcing it.

This occurred because the circumstances of the campaign cut me off from day to day supervision of administrative and related policies. The principal responsibility was given to Costas as my surrogate, on the assumption most of us shared, that he was best capable of such all-around responsibilities. However, National Executive Committee and National Committee members were eased out of all policy-making deliberations of any practical importance. After the August Democratic Convention, National Executive Committee members were prohibited from access to the information concerning the most crucial matters of financial and operating policy and practice. Then, the word was spread that various NEC and NC persons were foot-draggers, blocked, inept—relative to the world-class business genius Costas' increasingly disoriented mind imagined Andy to be.

policy-decisions which caused the problems. The impression was spread that Computron was the paragon of policy-making and practice—directly contrary to the truth: it has been the NCLC members in the field and in various business enterprises which have been carrying everything on their backs all the way through. With one important exception, none of the recent collapse of structure was caused by payment of campaign or campaign-related debt. Rumors to the contrary have been a complete hoax. There are some few lacunae in tracing flows of funds, but this in the order of probably not more than $70,000, and all of those flows from the field organization were duly authorized for issuance. The entire problem, three important cases aside, has been chiefly a variety of financial mismanagement shaped under a wrong perception of political priorities.

The crux of the financial management problems has been the institutionalization of a "need to know" practice which excluded me and all but a few of the National Executive Committee. There is no indication of "embezzling," but only of wrong choices, including one category of expenditure made contrary to my direct, explicit instructions. The problem is simply one of mismanagement, a mismanagement of the NCLC's affairs echoing the continued mismanagement of Computron.

The most fundamental political error involved was the degradation of the membership generally as well as the majority of the NEC—including me—in particular. Certain "wise guys" proceeded on the correct assumption that I and other NEC members would have objected strongly to certain policies, had we been adequately informed. Therefore, to prevent we "misguided meddlers" from opposing the "wise guys" policies, we were each given our "assignments" plus an occasional accompanying explanation which was in fact deliberate misrepresentation. The purpose of this was not consciously wicked. Those involved proceeded from the assumption that they were persons of Olympian wisdom burdened with the duty of "handling" we less gifted folk.

Thus, by adopting a policy which in effect degraded the politically-active membership to virtual robots carrying out assignments, the mental powers and experience of the field organization and National Executive Committee as a whole were excluded as efficient factors in the situation. As the exhausted membership tended to become depoliticized by the "wise guys" mismanagement of affairs, the political vitality of the organization was undermined, and performance lawfully began to decline at an accelerating rate.

By blowing the lid from this mismanagement, and giving the organization back to the members—in effect, we have effected significant, even qualitative improvements. These improvements are not outwardly remarkable by comparison with summer levels, but they are most substantial relative to the catastrophic decline to which mismanagement had brought us.

Meanwhile, we are developing consolidated management, and in that process have the overwhelming body of national figures and much of the regional data under administrative control. Now, we know more of what happened during the summer-fall period that those who were directing the process at that time. The thing which stands out, horrifyingly, is simply a record of monstrous mismanagement, combined with an admittedly heroic exertion by Costas and others to make the mismanagement succeed despite itself.

When the combined effects of mismanagement of the organization and Computron produced simultaneous crises in October, Costas cracked under the strain—he "flipped out." It was not the strain which caused the "flip-out," but his obsessive

(3)

bodied in policy had generated the aggravated form of crisis we faced. He manifestly "preferred" to "go bonkers," rather than face simply and coolly the fact that a grave political error had dominated policy-making. In former times, when we faced and corrected major errors many times, Costas would have reacted with a deep sigh of relief to the fact that the problem had been identified for correction. This time, because of the power of the delusion dominating his mind, he preferred to "go bonkers" rather than rally himself to enjoy the process of correcting the error.

The general circumstances which permitted an institutionalized policy of mismanagement to develop around Costas are classical. A significant number of members, feeling the burdens of old age, and tired of the ingratitude of the human race, retreated from "Paradise" to "Purgatory," to a yearning for "earthly paradise." Security and perks for family and sensual appetites loomed as of increasing importance, a Kantian morality, a wish that one might retreat from an ungrateful human race to enjoy at last some of the personal creature comforts which appeared to be "only a decent recompense" for a stress-scarred veteran of many battles over a decade or longer.

Interestingly, this foolish descent down the moral ladder occurred at precisely the moment we had effected the most spectacular accomplishment of this century in the global impact of our election campaigning. The organization had demonstrated a capability which Andy (for example) has never comprehended, a capability whose lack is key to the failures of Computron's manangement. When we were ostensibly crushed and on the ground, we rose again and renewed the assault—through that continuing approach, continued into October, we rid this nation of the Carter administration. If the incoming Reagan administration fulfills its leading promises to restore industrial growth, our efforts have saved the human race from the worst catastrophe in known history.

Nonetheless, the moral decline in some members' outlook was understandable, if nonetheless as irrational as it was lacking in moral worth. Personal life's demands are an insistent clamor. "Family responsibilities"are a more powerful moral-depressant than individual-personal demands.

Into this was introduced the myth of Andy the "world-class business magician," a myth which Andy himself tended to absorb as a outwardly-projected self-image. Computron became the cynosure for the morally tired. Not the actual Computron, badly mismanaged, but the mythical Computron of the days when Andy returned with a bag of gold from the Persian Gulf. The mythical Computron, not the actual Computron whose profitable software activities, its only day-to-day asset, were neglected and deprecated by comparison with the costly pursuit of moonbeams.

So, the NCLC, which approaches each day with a do-or-die determination and proficiency in accomplishing what others would regard as the impossible, carried the burden, while those whose comfort depended upon those members deprecated the members and made snide references to the lack of better performance from "blocked," unsophisticated "politicals."

The roots of this go back some years. Computron used to prohibit daily briefings from its premises. This foolishness was introduced to WorldComp at the start, and sowed the seeds of serious problems of business management there. The same poison of apoliticalization disoriented PMR, with effects of that still being carried on members' backs there and in the organization otherwise. Where the contribution to WorldComp's cashflow (for example) from marginal work dropped below that which could have been mobilized in field political deployments, the marginal (apolitical) work was cherished, so that members employed there would not have to contaminate themselves with the unbusinesslike ways of the political universe.

The field produces between $200 and $400 per member deployed, including almost the entirety of [redacted] income of FEF. Without that field-income, and without the dedication and sacrifice of members working in certain entities as well as in the regional and national offices, nothing would exist. Our field organization, our security organization, our intelligence organization are the only self-evident priorities of the whole. Everything else subsists (properly) only on the basis that it proves its worthiness to enjoy the support of our members.

It is the combined activity of our members, as a political organization, including our international intelligence and security-investigations resources, which is our purpose, and which is the source of the unprecedented achievements of the organization.

The Quality of the Organization

Recently, I have produced several short books. The first of these, concerning *credit*, was oriented to the needs of policy-makers interested in receiving our elaborated statement on this matter. This was in response to a general need within the U.S.A., and more emphatically in direct response to September meetings with scores of leading figures of politics, business, and finance which Helga and I held, during which the need for elaboration of such matter was emphasized. The other three were directed, in each case, to a specific policy-task, but were designed to selectively educate and recruit from certain platonic-oriented elite strata. They were also designed as updated educational materials for recruits to directly replenish our ranks.

These books, however, are simply an exposition of the same methodological approach which has characterized the organization since 1966. Associated with this method has been the notion of an organization committed to truth against all odds, an organization not only committed to truth but possessed of the method needed to discover efficiently what is truth.

Out of that combined resource, as reflected freshly in those books, we have developed an organization whose knowledge of and commitment to action is independent of the approval or disapproval of any popular opinion or authoritative institution. It is that specific sort of moral quality which has enabled us to rise from the ground and strike back with greater and more effective force than ever before each time the enemy has imagined himself to have crushed us. That is the secret of the organization—an organization based on persons who have assimilated that and who have found in themselves the moral stamina to act so despite the pressures of family responsibilities, personal desires for "earthly paradise" and so forth.

Ironically, those same qualities are the most admirable for business management—as many persons from that side of things have complimented us increasingly over recent times. But for members so steeled in the employment of certain entities, those entities would not have survived the combined problems of externally and internally-developed difficulties. The more political one is, the better a business manager one is in the clinches, indeed, in businesses which are successfully built, that same quality is always evident in a non-political form (usually). In such cases, a combination of a political-organizing sense with a day-by-day do-or-die approach produces success—in contrast to the lackadaisical approach toward decisive policy-matters which has sometimes affected the business entities with which the members are associated.

I am not deprecating Andy's achievements and capabilities. I am simply exploding the lunatic myth which Costas has helped to develop around Andy. Andy is effective, as long as he does not lose sight of his limitations as a business executive, as well as his lack of understanding of the ABCs of the human side of the political-organizing process.

(4)

ICLC Internal/Confidential

Put the Costas Problem into Political Perspective.

Lyndon H. LaRouche, Jr.
December 17, 1980

The International Caucus of Labor Committees is the miracle of 1980. Within the perceived limits of factitious advantage, the forces associated with the continuation of the Special Operations Executive have engaged over a period of more than twelve years in an escalating campaign to eradicate the ICLC's existence. By our methods, including the enhancement of the potential of factitious advantage, we have not only survived—where no other organization in similar circumstances ever survived—but, with the aid of the 1980 election-campaigns in the U.S.A. and West Germany—have altered significantly for the better the infrastructure determining world politics.

This continuing struggle is not without costs. People do tend to wear out through "combat fatigue." The flaws in personalities which make individuals susceptible to such "combat fatigue" are *sex, money and family*. "Sex" is often the direct, vaseline-lubricated skid from even "Paradise" into the "Inferno." "Money" is sometimes as dangerous as "sex," but is more often, like "family," a means of descent into "Purgatory," from which point the descent into the "Inferno" next proceeds. As Brigadier John Rawlings Rees and others have documented, the kernel of British (Tavistock) psychological-warfare technique concentrates on applying the principles learned in study of "combat fatigue" cases from battle-conditions to such targets as our members.

That is the key to understanding Costas' present paranoid condition, including the question of whether it is possible for Costas to recover his morality under his present state of extreme disassociation.

Politically, Costas' present behavior is one of opportunistic political renegacy, a political betrayal of the human race. Since Costas is incapable of such renegacy in a sane state of mind, it was necessary for him to go insane in order to betray what he had earlier dedicated his life to accomplishing.

There are two problems. One problem is the personal problem of Costas' present suffering. The other is the reluctance of some to face the ugly truth of the political implications of Costas' mismanagement of the organization's affairs. We can, from a personal standpoint, excuse Costas' malfeasances on the expiating premises that he did this under the influence of a march toward insanity. Although we can be understanding and compassionate toward Costas personally, we must not confuse that compassion with the enormity of the political malfeasances themselves.

In particular, there has been some recent misguided argument about the failures of the National Executive Committee generally during the relevant period. Certain facts, both true and distorted, are used by some in the effort to shift their own focus away from the enormity of what Costas' actions represented in consequence. It is necessary to put those mixed accurate and distorted criticisms of the NEC into perspective.

First, I shall summarize the way in which I discovered Costas' insanity, a summary account which bears directly on the political malfeasances consequent upon that mental problem.

Who Knew What?

I begin with the fact that I had no relevant information on the nature of the crisis until Costas' refusal to speak with me by telephone, a refusal sparked by his irrational reaction to a

memorandum transmitted on the pro[illegible]s of Computron. It was only from that point that I began to piece together the evidence concerning a process which had been ongoing for months.

Like most members of the NEC, from February 1980 onwards, I received only piecemeal, misleading information concerning a number of crucial situations. This was not entirely improper. I had delegated responsibilities and authorities to Costas, because I judged him the person generally accepted by the NEC as well as myself to be the best suited to approximate my overall responsibilities for the NCLC for the duration of the 1980 election-campaign.

However, Costas increasingly excluded the NEC members generally from information. It might be argued that those NEC members might have double-checked Costas' reports. It might be argued more competently that I should have been told that vital information was being systematically kept from the NEC. I should also have been told of warning signs of Costas' growing insanity. I was not told of the former because NEC members presumed that Costas was adequately informing me, and that Costas was acting in agreement with my policy—which Costas did argue on a number of occasions where he was (sincerely or not) grossly misrepresenting my authority. (This included outlays for specific ventures which I had explicitly forbidden be made.)

This was complicated by Costas' increasingly paranoid hostility toward various members of the NEC and others. This created a situation in which the NEC could fulfill its responsibilities only by confronting Costas and calling him to account. It must be empnasized that these are the same NEC members who have recently pulled the organization back into functioning shape, doing so largely by being given a goahead for doing what Costas (chiefly) prohibited them from doing earlier.

In practice, *the only competent criticism of the NEC was that I was not told my direct intervention in the situation was imperative.* Those who have a different view of how the NEC erred have yet to learn the ABC's of institutional life. The best executive in any organization would have behaved no differently.

Carol White was the chief target of Costas' paranoia against the NEC, a vendetta which drove her wild and produced in her outbursts which were then used to justify the vendetta. This played upon her well-known neurotic reactions concerning the one area we keep her away from—financial crises. Except for her brilliant work in connection with the New Dark Ages, where her political leadership qualifications were afforded room for action, she was effectively neutralized.

Warren Hammerman had a few private fights over issues on which he was right, and then he capitulated.

Uwe was disoriented, and his weaknesses brought to the fore.

Allen Salisbury, was driven into fits by circumstances he rightly viewed as degrading him, and to which he reacted overall with inappropriate, resentment-brimming withdrawal.

Chris White was neutralized.

Criton Zoakos has never backed Costas organizationally since the events in Germany nearly a decade ago.

Ken Dubo was ostracized and deprecated, except when his special services were needed for an emergency.

This all occurred under "combat conditions," in which no one wished to "rock the boat."

In short, the situation was such that matters could only continue to worsen until I was brought into the picture.

(5)

My first inkl[illegible]of the problem's actual nature and dimensions was Costas' decision to collapse the entire European organization. Costas had the data informing him that he was collapsing Europe. When Uwe Friesecke confronted him with that fact, Costas responded with a vile, lying attack against not only Uwe, but much of the European organization, hinting even then that he was about to unleash massive lies against Helga.

I did not grasp even then the enormity of the problem. I attributed Costas' psychotic episode to combined physical and psychological stress in terms of known factors, and concentrated on calming him, reassuring him that I would return immediately if he judged the situation more than he could carry.

During that telephone conversation, Costas reported to me that the crux of the problem as a whole was the threatened collapse of Computron, which he reported as the result of the "Olympians" blocking of Computron's sales. This report by Costas was not entirely accurate, but I took it at his word, and transmitted memoranda demanding immediate counteraction against the "Olympian" agencies responsible.

In response to this Costas and Andy reacted violently. This was my first inkling that Costas' attitude toward Computron involved a mentally-aberrant obsession, rather than objectively-based concern as such.

It was at that point that Costas, for the first time, broke off communication with me, and the first occasion his attacks on the European organization focussed on Helga as the target of his lying, paranoid vitriol.

Later, he did relent on collapsing Europe, but the problem worsened in other respects.

The fact of the matter, as subsequently confirmed, was that Costas had made a decision to collapse Europe, and had concocted the lying attacks on European EC members and others as a smokescreen, a diversion of his own mind away from the enormity of the immoral decision he had made. I also discovered that he had acted similarly in his decision to collapse Colombia, behaving shamelessly toward LALC, threatening them if they once again attempted to lobby for not writing-off Colombia.

The period, after my return, until his paranoid outburst at the NEC meeting, is relevant.

I was to meet with Costas and Andy, to review the Computron situation. I reviewed this matter and other matters of business organizations with Costas over several hours—Andy was late by several hours for the appointment. Later, Andy gave a separate report, contradicting directly many things Costas had reported. I now know that in some matters Andy was wrong, and in others Costas was mistaken. Both, however, were selling me a bill of goods. Andy, for example, assured me that Computron's financial situation was fully covered by credit—which was exaggeration to the point of untruth.

Both attempted to assure me that the business entities, especially Computron, were all in stable condition, and that only the failures of the political organization were a financial problem. As long as they imagined that I was about to limit myself to correcting the nonfeasance of the field organization, there was no conflict.

Imagine the enormity of it all. Over a six-months interval, field income had risen in aggregate by about $100,000 weekly. Invoiced earnings of entities, including the FEF, depended predominantly on field deployments—with the field subsidizing FEF almost entirely. Although the field performance was dropping, clearly a result of mismanagement from the national center, the field organization's performance was not the problem, could not be the problem.

For example, EIR has reached the level of $$ millions, the largest and fastest-growing component of over[illegible]ncome. This is the sale of intelligence, a component of input which was being cut. Certainly gross mismanagement even by the most rudimentary business standards.

There was a problem in the field, which is being remedied as rapidly as might be hoped, but the field problem is a consequence of mismanagement from the national center, a consequence of the same kind of immoral mismanagement which governed the decisions to collapse Colombia and Europe.

These two cases, Costas' decision to collapse Colombia and Europe, are paradigmatic. There were numerous, other decisions to the same effect with respect to the U.S.A. organization.

Aggravating Influences

Costas' own problems were being aggravated by a sophisticated targetting of Computron executives, especially Andy, by Dope, Inc. There were several approaches, which recent investigations have proven to been a coordinated deployment. Andy hired persons directly tied to circles setting up members for physical attacks up through assassination, under circumstances in which Andy should have recognized the connection. He incurred substantial expenes, of both money and major sections of his energy and time—taken away from business—because of errors of business judgment made by forces operating with foreknowledge and monitoring of his psychological profile.

While Andy was throwing tens of thousands of dollars out the window on moonbeams brought to him by enemy forces, he was spoiling important business opportunities of substance. I have direct, verified knowledge of three major business opportunities directly ruined by Andy's discrediting himself in the eyes of prominent business circles which were attempting to help Computron considerably as a personal favor to me.

There is no competent argument against the judgment that Andy's management has been increasingly incompetent. The basic firm is sound, but Andy's recent policies, if continued, will ruin it.

There are those who insist that Computron's software is not profitable. That statement is totally inaccurate. I know Computron's total expenses and its sales margins. If one deducts from Computron's expenses the amounts which are unrelated to software, and which are largely wild-goose chasing, the proof of software profitability stands out immediately—and conclusively.

There are two special reasons for this profitability. First, Computron's productivity and quality in software are superior to that found in any competitor, by up to an order of magnitude. Second, Labor Committee members and a few other producing persons employed by Computron are receiving $12,000 of incomes for $25,000 of quality performance. That latter discrepancy in wages has been a margin of implicit capitalization of software development costs. If proper training programs were resumed—admittedly a form of capital cost—the productivity would be increased.

Granted, some of Computron's development ventures could succeed, if their promotion had been approached on a sound basis, rather than the wild, irresponsible sort of long-shot gambles which have cost so many tens of thousands of dollars.

Just to be clear on the latter point, without naming the specific venture involved

I stated to Andy emphatically in New Hampshire and later that a certain desired business arrangement could work, provided I negotiated the crucial final step in the arrangement. That [illegible] its

failure or success depended upon the outcome of my intervention at a crucial po[illegible] Not only was I bypassed, but tens of thousands of dollars were spent in an approach described as unworkable by very expert in doing business in the Middle East. I gave Andy a better chance of succeeding than any of those experts, because of a political asset I hold which Andy and Costas lately profess to overlook. Even with that added factor, Andy's Middle-East business ventures resemble parlaying long-shots at a Las Vegas roulette. Andy might have a limited success, but it would occur as one of the wildest, least-earned long shots in business history.

As far as Andy is concerned, the whole problem is merely one of talking to him like a "Dutch uncle," and prompting him to get off this suicidal kick, to get back to business and stop all this costly, fantasy-pornographic screwing around. The problem is the way in which Costas has reacted to Andy's curable episode of financier-delusions. Costas, who should have straightened Andy out, has instead become a major reenforcement of Andy's suicidal pursuit of "magic."

Costas' Computron Syndrome

What has been operating on Costas is not Computron, but influences impelling him toward leaving politics for business. Since Computron is the only visible avenue for making such a shift of loyalties, Costas has been on a "save Computron" binge whose motive has been protecting an avenue of escape from political life, not a realistic view of Computron's problems.

If Costas had been concerned to "save Computron," the first thing he would have demanded is a slash in unnecessary expenses of chasing "moonbeams." He would have reamed Andy royally for ruining important opportunities by attempting to con our helpful friends, and would have taken assorted measures to similar effect.

One recent case is exemplary. One of our most influential friends made an appointment to meet Andy. Andy made a mess of it, so that the friend left the appointment early in disgust and rage at Andy's efforts to "con" him rather than get down to a truthful account of matters. Costas and Andy refuse to admit that Andy's hype ruined that meeting and opportunity. As Andy's (illegible text)obsessive in insisting that he saw the man being overwhelmed with (illegible text), by Andy's performance.

Why does Costas need to believe in the purely mythical delusion of Andy's "magic"? The phenomenon is not unfamiliar. It is an attitude of loyalty toward one's employer, toward the "genius who founded this company." Costas is viewing himself as Andy's employee, to the point of sycophancy. He distinguishes between "insiders," who are permitted to gripe, and those are "outsiders," from which no criticism will be tolerated, even if the same criticism is fully agreed upon by leading "insiders." Anything which might tend to mar the illusion of Andy's "miraculous powers of business magic" is angrily denounced as a "lie," simply because tolerating its repetition might mar the delusion.

Since Costas could not proceed toward the change of loyalties from politics to business directly, all at once, he had to suppress conscious recognition of the shift in loyalties during the initial period such a shift was developing. The discrepancy between what Costas represented as his political policy in words, and the contrary, apolitical priorities increasingly introduced to practice, was covered by the customary neurotic repression of truths the conscious conscience would not tolerate.

He elects to destroy the Colombia organization, to marshall the resources to "save Computron." His anger is directed not against his own decision, but against those LALC representatives who anger him by asking him to repeal such an immoral decision. He elects to destroy the European organization, and

attempts to cover up that immoral [redacted]ision by inventing paranoid lies against the European organization.

He informs me by telephone that Computron is the only major problem, and then calls me a liar when I react to his information by proposing that the organization take concrete steps to counterpunch the "Olympians." Later, when I referred to the fact that it was he who had reported this problem to me, he calls me a "liar." Anyone who says that Computron's management blunders should be corrected with at least an approximation of the severity with which Costas directed the "Schachtian triaging" of the political organization for the sake of Computron is called a "liar" or something equally vile even for proposing to discuss the matter.

All of the so-called "factual issues" which Costas has been raising in his paranoid rages are red herrings. There is not truth to any of those "factual issues." The function of those "factual issues" is to divert discussion away from any discussion of Computron. That is, if Costas once faced the truth about Computron, which in fact he knows rather well, the entire superstructure of his lying on all other issues would collapse.

Thus, it is Andy's own misguided efforts to protect the myth of his "$100 millions potential" which is the prop for Costas' present paranoid self-degradation. If Andy would face the truth and tell Costas to stop the insanity, Costas would recover. Without going directly and exclusively at the issue of correcting mismanagement (illegible text)

Internal Notice

It has been reported from several locations to the National Center that certain members have decided "not to sell Fusion" under the excuse that by selling Fusion, one becomes victim to the "FEF Syndrome." Any rumor coming from New York that purports to justify this is precisely the kind of SOE-type rumor-mongering campaign that was warned against in the Dec. 26 memo.

(Part of the 12/31/80 MB)

ICLC Internal Memorandum

From L. [illegible]ouche
January 12, 1981

Andy Still Wildly Blocking Out Reality

Since Andy T. has refused to meet with me since our last very brief meeting together with Paul T., and has also refused meeting with either Security, Finance or other NEC members on the [illegible]rgent crisis at hand, I am forced to rely on this fact but cross-checked reports of his false statements about me and Labor Committee matters to Labor Committee members. Since those false statements from Andy affect the morale of members of the organization, and are potentially damaging to both Computron and Andy himself, I regret that I must deal with this by internal memorandum.

First, exce[redacted]r personal contributions to the organization by officers and employees of Computron, including personal loans by Andy himself, over the past months Computron has survived because of massive financial assistance from the Labor Committees, both direct aid and massive infusions of credit. This amounts to hundreds of thousands of dollars of direct and indirect aid out of the pocket of the organization, and has been the only significant source, directly and indirect, of assistance to cover massive Computron losses incurred chiefly by uncapitalized outlays, including costly and rather numerous and fruitless foreign trips, to cover promotion of a special product unrelated to Computron's software business.

The point has been reached and passed at which we can presently continue to subsidize Computron as was done by Costas K. during the period since New Hampshire.

The associated problem is that while the special product is eminently marketable, Andy T. has been induced to believe in a fantastic myth concerning the way in which the financing of high-technology corporations is actually implemented, and has refused numerous opportunities to secure equitable terms of capitalization because he has been encouraged to hold out for a mythical arrangement which no investor in his right mind would ever offer.

This is complicated by Andy's stubborn refusal to face the fact that his employment of a person linked politically to the Armenian Secret Army ruined his opportunities for business in France. Whatever that individual's actual private beliefs and commitments, he remains a point of grave danger to the security of Computron and the Labor Committees because international intelligence agencies view Computron as harboring a person they have accurately linked as having a ten-year association with the political organizing providing cover and assistance to the terrorist organization.

Andy has mixed reality up with a misguided effort to defend what he regards as his ego in the matter, and tends to spew false statements like Wall Street ticker-tape confetti upon whomever he accosts in this and related matters. Since Computron is essentially sound, the matter could be straightened out if he would merely face reality for once.

The problem goes back to 1978, but became increasingly acute after the successive publica[illegible]on of the Our Town and New York Times articles. Under these conditions, especially over the course of most of 1980, Costas became increasingly psychotic, a growing pattern of episodes which many viewed as outbursts of merely irrational rage against one person or another. Under this influence, over the Spring and Summer, into the Fall, Costas directed many imprudent actions of a sort he would never have tolerated had he been fully in his right mind. These imprudences were not understood as such by many of the persons involved at the time, since none of them had the knowledge of other aspects of the same overall business to understand what was really going on. Costas, and to a lesser degree Andy and Chrissa, did necessarily have more or less complete overview of these incompetent actions, all taken with the motivation of "saving Computron" even at the expense of the basic infrastructure of the organization generally.

What was being subsidized in fact was not Computron as a software firm, but rather what was being subsidized was the margin of Computron's losses caused by Andy's wildly incompetent approach to marketing non-software products. In this process, Andy was dealing principally with, and being psychologically manipulated by, persons in Europe and North America as well as the Middle East, who all turn up on the list of key personnel tied to Dope, Inc. Andy is being psychologically manipulated by the flaw in this psychological profile, his proclivity to substitute bullshit for reality, and to imagine that the "psychology" of a fast "sales pitch" can solve all problems of reality, in defiance even of hard reality itself.

Internal Memo From L.H. LaRouche
To All Members Of The NCLC January 15, 1981

My investigation has shown that *in the moral opinion of the membership,* Gus, along with Andy, and with the complicity of Chrissa, has been a liar and a thief increasingly over the last two years, and massively so.

The facts will come out in due course, but don't be surprised by a figure of up to or more than one million dollars.

New Solidarity International Press Service
News Release No. N-6

LaRouche Reaffirms "1.5 Millions" Analysis

New York, Jan. 17 (NSIPS)—Former Democratic Presidential candidate Lyndon H. LaRouche, Jr. strongly affirmed today his earlier published statement, in which he distinguished between an estimated one-and-a-half million Jews killed by the Nazis under Goering "Green File" and related policies, and those Jews killed as part of Alfred Speer's slave-labor program.

"Although there is no doubt that Anglophile-linked Goering would have killed six million Jews or more outright," LaRouche stated, "the fact of the matter is that most of the Jews killed by the Nazis died at the hands of Speer, not Goering." LaRouched Added, "This point I emphasized in a published article attacking Felix Rohatyn, who introduced the same policy to the government of the City of New York under which Speer had murdered the overwhelming majority of the Jews and other slave-labor victims murdered by the Nazis.

"There is only one conclusion to be made concerning those who have objected to my distinction among the two categories of Nazi murders. By alleging that six million Jews were killed entirely as a result of the "Green File" policy of Goering, those who criticize my distinction are covering up for the man who directed the murder of the majority of Jews who died: Albert Speer. Such a coverup is consistent with the toleration of the leading neo-Nazi economist of today, Milton Friedman."

LaRouche added: "Fascist sympathizer is therefore the only admissable term for those who have attacked my statement."

End News Release No. N-6

ICLC Internal Security Memorandum—Highest Priority
By Lyndon H. LaRouche
January 17, 1981

International "Yellow Alert-Plus" Status

The ICLC is herewith placed on security status "Yellow Alert-Plus" concerning probable endangerment of prominent international political figures, including NCLC Chairman Lyndon H. LaRouche, Jr.

The agencies responsible for this present state of endangerment are an alliance among the "Solidarist" forces of IMEMO, the KGB and the Socialist International, as well as the "Liberation Theologists" per se, plus Tavistock-centered elements of British SIS. Behind those forces are the London financial community ahnd SIS-command elements of the private houshold of Queen Elizabeth II. At the top-level of this wickedness is an aggregation of the private family funds of old "Black Nobility" families centered upon Venice and its adjunct city, Genoa.

The acuteness of the present danger is defined centrally by the conjuncture of the inauguration of President-elect Ronald Reagan and the threatened defeat of Socialist International-allied forces around Ponomarev and Suslov in the February conference of the Communist Party of the Soviet Union. Typified by the wickedness conduited through the outgoing Carter administration and Henry A. Kissinger, the enemy forces mobilized behind the Socialist International's front are deploying every capability to the purpose of affecting destablizations within and outside the United States at this juncture.

Targets

Obvious principal targets for possible assassination attacks include President-elect Reagan, France's President Giscard d'Estaing, Mexico's President Jose Lopez Portillo and other prominent obstacles to the "post-industrial society" policies of Volcker and his masters associated with controllers of the Socialist International.

Every indication is that there is something just short of a "red alert" security-watch around President-elect Reagan. The record of the FBI in the matter of the JFK assassination and its aftermath is of grave convern to us in this connection, as well as the penetration of the incoming administration by Socialist International-controlled Heritage Foundation influences and also circles associated with the New York East Side Conservative Club. Members should be on the highest degree of alert for any information which might require investigation and evaluation in this connection.

Under these conditions, there is also a high risk to the lives of ICLC leading figures. Some of the forces which are under scrutiny by security agencies as potential threats to President-elect Reagan have LaRouche and others high on the list of preannounced targets for assassinations.

There must be no blocking on patterns of developments of the sort to be reported to Security. All information must be transmitted immediately to Security in New York City. This pertains not only to ostensible signs of physical menance, but to any queer form of increased harassment by the FBI or others against elements of the organization, including individual members. Remember: *the counterespionage element of the FBI is a major potential source of assistance to assassination attacks by some of the suspect organizations and persons.* (Remember who killed and who aided in covering up the assassination of JFK!)

FBI Links

A paradigm for the links between the Foreign Divisions of the KGB and the counter-espionage division of the FBI is provided by the case of the "Armenian Secret Army" terrorist organization, which is indicated as being in cooperation with the FBI and Anti-Defamation League, and also with the Soviet KGB. An asset of the political mother-organization of the Armenian Secret Army has penetrated a firm in which members are employed—Computron—and constitutes several kinds of security-threat to the organization generally, as well as a major danger for Computron itself.

For the present period only an ignorant person or blind fool regards the FBI's counterespionage and related operations as different in this respect than the Soviet IMEMO-KGB forces, The two forces are co-deployed against what they regard as leading common adversaries.

Internal Security

The leading among several known risks to the internal security of the organization is the case of Costas Kalimtgis, who is presently in a paranoid-schizophrenic condition and is deploying against the organization with a campaign of lies aimed at confusing and destabilizing as many selected members as possible. Costas' state of mind is that of an evil "Mr. Hyde," who, like the Robert Cohen who turned against the organization for the organization's refusal to order selected members to provide him with sexual gratification, has a bitter "grudge" against the organization for catching him with his "hand in the till," for diverting more than $750,000 from the organization through deceit and other fraud against the National Executive Committee and general membership.

Costas is currently a pawn in the hands of forces linked to both the KGB and FBI, and, together with Computron, has been under FBI counterespionage investigation since no later than 1977 to the present date. The pretext for this operation under the pretext of investigation is the continuing relationship of his mother to a relative associated with the KGB and with a KGB-linked operative based at the United Nations Organization headquarters in New York City.

Furthermore, Andy T. has been a pawn under the manipulative control of agencies directly linked to both Dope, Inc. and international terrorism since no later than late 1978.

The danger to the New York side of the organization is that alien persons may attempt to exploit some foolish dupes' misplaced sympathy for Costas or Andy to gain access to penetration of security screens. Presently, Costas' evil state of insane mind and Andy's stupidity makes either of them and their foolish admirers ready dupes for manipulation. Although Andy has been approached for cooperation in sealing off his firm's continuing links to international terrorism, positive action to that effect has yet to be completed.

Duration of Alert

The present state of international alert will continue until the safe and complete inauguration of President-elect Ronald Reagan, at which time a new evaluation will be made on the basis of accumulated indications, plus information received from relevant sources.

(9)

ICLC Internal Memorandum
By Lyndon H. LaRouche
January 17, 1981

Correcting Mismanagement Errors

The principal cause of the problems of World Comp, and a major contributing source of blunders at PMR has been Andy T.'s wrecking-action conducted with full support from Costas K. Both joined in ordering a depoliticization of World Comp's personnel, and in running slander-operations and other forms of harassment to the purpose of discrediting the status of National Committee members.

Specifically targetted by Andy, with Costas' support, were Ken Kronberg, Mike Minnicino, John Sigerson, and Nancy Spannaus. These targetted persons were the leading qualified persons involved, and were assigned to lead in implementing policies discussed with and approved by the NEC and its chairman. As a consequence of rotten harassment and other actions initiated by Andy and Costas, World Comp was largely disorganized and damaged during its period of initial operations.

As members will recall from the 1978 conference, World Comp was initiated as an outcome of a policy I set forth at that conference, as adopted by the body at that time. This policy was to secure members engaged in outside employment against the evil operations we cited as examples then; we would utilize the fact that political leadership qualifications and business-leadership qualifications tended to be correlated. Andy, with support from Costas, set out to undermine that policy, using the wholly-groundless cover-assertion that Andy T. had advanced capital to World Comp, when, in fact, precisely the opposite was true.

No one could have succeeded in such a deliberate subversion of adopted policy without the complicity provided by Costas, and without massive lying to me by Costas on these and related matters on which he was formally accountable to me.

The environment introduced at World Comp and spilled over into PMR and other locations was the direct principal cause for demoralization and misdirected performance in those locations.

No one could have succeeded in such a deliberate subversion of adopted policy without the complicity provided by Costas, and without massive lying to me by Costas on these and related matters on which he was formally accountable to me.

The environment introduced at World Comp and spilled over into PMR and other locations was the direct principal cause for demoralization and misdirected performance in those locations.

This rotten policy endorsed by Costas was consistent with a ridiculous, totally-incompetent and rejected memorandum of about one page in length authored by Andy in 1974. That document from 1974 is unfortunately a source of insight into Andy's monstrous mismanagement of Computron over the period since October 1978. In matters of business management Andy's performance all around has been that of a "fast-talking salesman," virtually a confidence-man, who imagines that he can either talk his way out of everything or construct a mass of dubious financial paper. In fact, he is a pathetic amateur, as we have seen from studying the trail of paper which he and Costas put together in the course of their efforts to loot the organization.

The function of this memorandum is to return [redacted] those NC members and others immorally abused by Andy and Costas a part of the dignity of which they were immorally robbed. For myself, every track of uncovering what Andy and Costas did together, whether in financial operations or in matters such as this, causes me to vomit. Let us put the organization fully back together on the basis it was built, and purge the last vestige of this pragmatic, amateurish immorality which we are uncovering most extensively from day to day.

January 19, 1981

To the National Executive Committee of the NCLC

It is with sorrow that we, long-standing and loyal members of the National Caucus of Labor Committees, announce our resignation from that organization. The memos of Lyndon H. LaRouche are a hideous, moral abomination which can only destroy the ability of the organization and of its membership to contribute anything positive to the future of the human race. It was bad enough that LaRouche should echo the words of a known Nazi sympathizer, Willis Carto, cynically dismissing the true horror of the Nazi holocaust with the argument that "only" one and a half million Jews died. Much, much worse is the fact that LaRouche was too small a person to admit his mistake and retract that damaging statement, but instead sought to wallow in its reaffirmation. That reaffirmation was the sign of a mind which has become dangerously ill, a soul which has died.

How dare he set up Costas Kalimtgis, who has spent his entire life in the humanist movement and who was our acting chief executive for so many years, for character assassintion, and perhaps worse, as a "KGB agent"? How dare he villify and arrange the legal frameup of loyal, self-sacrificing members, Chrissa and Andy? If you remain, you are complicit in this.

There is no such thing as the "moral opinion of the membership," when the membership has been psychologically profiled and whipped into a frenzied, unthinking mob. There is only the truth.

Look inside yourselves. If there is any man or woman among you who is not a pathetic, lying coward, you must resign now.

Donald Roth
Alice Roth
(signed)

ICLC Internal Memora[redacted]n

(10)

First Steps Toward Rapid Growth of Capabilities

By National Executive Committee, NCLC
January 20, 1981

Over the course of this week, the NEC will complete its decisions on details for an initial phase of qualitative improvements in both field and national-center operations.

1. At least two, and possibly three NC members will be deployed to critical growth areas of field operations during the coming fortnight.
2. In addition, five or more additional organizers will be deployed into these growth areas.
3. Both the American Political Intelligence and Economic Sectors of Intelligence will be substantially strengthened.
4. The rationalization of administrative functions will be begun.

Although the measures being taken are fully justified by the current increase in growth-opportunities nationally, it will not and should not be overlooked that this represents a direct reversal of a drift in policy of practice over a period of approximately two years. The membership would not be able to approach new undertakings with confidence unless the members generally were assured that the NEC had fully confronted and corrected the grave errors tolerated over the past two years mismanagement of the administrative side of our operations.

Therefore, we now present our summary account of the nature of those administrative errors, and also an accounting of what was and what was not damaged.

The Kernel Problem

Since no later than Autumn 1979, the NEC member responsible for administrative affairs, Costas Kalimtgis, has been complicit in damage to the organization done under the cover of willful deceit of not only the NEC Chairman, but the NEC and organization as a whole. During the period from November 1979 into November 1980, this involved a massive diversion of organizational funds, under cover of deceit, to subsidize the massive losses which a firm, Computron, was incurring through gross mismanagement of its own business affairs.

The most criminal of the recent actions taken, from a moral standpoint, in this diversion of monies and credit to Computron, were the willful cutting-off of payments to Colombia and to European operations. In both cases, these actions represented Costas' willful decision to destroy both organizations in order to free payments due those organizations for diversion to Computron.

Costas' actions to this effect are mitigated by the evidence that he has suffered a mental breakdown of a classical paranoid-schizophrenic type. In layman's terms, he has a double personality, alternating between a "Dr. Jekyll" personality which is a weak, depressive echo of his former self, and a raging, venomous, lying "Mr. Hyde." In effect, two distinct personalities occupy the same flesh.

Beginning with the deceitful diversion of a massive amount of funds to Computron during Autumn 1978, the proclivity to pilfer the organization in concert with schemes provided for this purpose by Andy T. was associated with an anti-political policy,

a conscious organization-wrecking policy, which Andy introduced, and which Costas consistently supported at Andy's instigation beginning Autumn 1978. The myth employed to this latter purpose was the allegation that Andy "the world-class business operator" was correcting the amateurish and bungling of the political organization with introduction of "sophisticated business methods," in the name of "professionalism."

In fact, from Autumn 1978 onwards, the point at which we have presently conclusive documentation of the matter, except for proceeds of software sales, Computron never made a nickel except for the masses of funds diverted from the organization by various deceitful means. Over that period, there was never any net flow of funds from Computron to the organization—directly contrary to a lying myth with Andy and Costas repeatedly avowed as cover for the diversions of assets from the organization.

Furthermore, we have received a holographic document in AndyT.'s hand from a third party which outlines his long-range plans for looting the organization. In effect, this document and related evidence of actual practice, show that Costas and Andy were proceeding as the document outlines, to strip the organization of various technological capabilities, as well as other assets, to build a T. "empire" around a coopted group to be settled in the Riverdale area of the Bronx. This included Andy' and Costas' plan of 1980, to steal the EIR by giving Andy a sixty percent interest in an incorporated EIR, and a number of concrete efforts to steal World Composition.

This dirty operation was not, however, simply a joint concoction of the indicated witting perpetrators. In nearly all of its activities not directly related to software, Computron's management has been under the psychological control of forces integral to or directly allied with "Dope, Inc." Andy's psycho-profile was readily recognized and easily manipulated, and, in some yet undetermined way, Costas was also corrupted. The key position of the Computron employee linked to international terrorism (and, also directly to the FBI) is merely an illustrative, integral feature of the overall manipulative control exerted over Andy T. in particular.

These two conducted a fairly effective operation to keep NEC members from auditing any significant features of the administrative processes. The Chairman was isolated from direct audit of these matters, both by security problems and by the obligations of the presidential campaign. By consistently lying to the Chairman, but also lying to the NEC respecting matters allegedly cleared with and reported in full to the Chairman, Costas used his position as chief of staff responsible for administration to keep other NEC members from exploring matters under his supervision.

This was complemented by a persistent slander and harassment operation against various NEC members, beginning with a dirty operation which Andy and Costas jointly ran against Nancy Spannaus and Ken Kronberg (most emphatically) beginning October 1978. A different slander and manipulation operation was run against Carol White, against Allen Salisbury, and Christopher White. As a result, the NEC was confined to political-intelligence and political-policy matters. Costas' and Andy's policies respecting administration matters could not have been challenged effectively except by NEC action to suspend Costas from his duties for refusing to make competent disclosures. The unwillingness to organize such a challenge to Costas' raging dictatorship during the difficult period of the election-campaign was key to NEC toleration of a situation whose monstrous implications it did not even suspect.

(11)

Damage Assessment

Following the New Hampshire primary, Costas' and Andy's policy was to reduce the campaign to relatively token proportions, permitting just enough effort to be maintained to lull the suspicions of the Chairman and others. Except for television broadcasts and literature, there was virtually no campaigning after New Hampshire except for Wisconsin and episodes in Texas apart from the security-linked tour operations! The priority was funnelling a growing amount of support to Computron, a priority which reached a point of crisis during Costas's and Andy's efforts to tear down security during the midst of the August convention, at a time when an imminent terrorist attack on the presidential candidate's party was the subject of a general security alert among some law-enforcement agencies as well as the various security organizations immediately dedicated to the candidate's safety. Why the conflict? Funds diverted to Computron had been so large that to cover security requirements, Andy would have to relinquish some of those funds.

This crisis, concealed from the Chairman at the time, was the subject of several days of heated discussion, with Warren Hammerman opposing Andy and Costas, during that period, as well as a massive interference with security itself, with Andy's participation.

Furthermore, although policies for the immediate period thereafter were discussed and adopted with participation of the Chairman, all of those policies were immediately countermanded, without informing the Chairman, thereafter, at the instigation of Costas and Andy.

This state of affairs came to the attention of the Chairman only during October and early November, as a result of a series of incidents which showed conclusively that Costas had gone effectively insane.

This series of incidents should be summarized here, since it indicates the crucial features of the problems and how they were finally uncovered in full.

EIR GmbH provides European intelligence for New York. To cover this EIR cost, including communications cost, and also security costs, EIR NYC is invoiced a combined charge of about $15,000 per week. In addition to this amount, persons in the U.S. had contributed about $32,000 for support of Helga's election-campaigning. During late August and September, most of those sums were withheld. Toward the last of September, funds due Europe were diverted to Computron weekly, bringing Europe to the point of irreperable financial collapse. In October, Uwe Friesecke attempted to communicate to the New York Office the disastrous nature of the situation Costas's policies had created. However, Costas already knew the nature of the damage to Europe his subsidies to Computron were causing.

Costas spoke to both Uwe and to Helga Zepp-LaRouche at this point. It was an obscene transatlantic phone call, followed by a repetition of the same lying, venomous obscenities against Uwe Friesecke and other Europeans generally to the Chairman.

The Chairman succeeded in calming Costas down at that point, during an extended conversation. The Chairman assumed at that point that Costas' mental state was essentially a reflection of stress combined with what was then mistakenly believed to be primarily a problem of Costas' physical health.

In the concluding portion of that conversation, Costas described the strains on the U.S. organization with a report at least echoing the general outlines of the truth. He stated that WorldComp and PMR were in relatively strong shape, and that without their help Computron would go under. In response to this information, the Chairman wrote two memoranda outlining proposed remedial action to deal with the problems caused to

Computron by the parties Costas has described in his telephone conversation as the "Olympians." This included a security investigation of the dirty tricks being deployed against Computron.

In response to this memorandum from Europe, Costas and Andy exploded into a rage against the Chairman and Helga Zepp-LaRouche, refusing to speak with the Chairman by telephone. The circumstances and Costas' behavior showed that the chief of staff was clearly not competent mentally. At this point, the Chairman chose to schedule an immediate return to take charge of administrative affairs.

After several meetings during the first twenty-four hours of the Chairman's return, during which both Costas and Andy T. lied sweepingly on many crucial matters, Costas exploded in two successive psychotic episodes of virtual babbling during the cours of an NEC meeting. During the course of the second of those two psychotic episodes, he stormed out of the meeting, and has never since attempted to resume active functioning. Subsequently, as his behavior became increasingly deranged and uncontrolled, it was necessary to suspend Costas formally for reason of his mental condition.

The cases of the damage to Colombia and Europe are merely outstanding. Their significance is that they demonstrate in the most concentrated way that Costas' and Andy's actions in these cases were infamously immoral. However, in case after case, material damge and psychological injury were done to one after another element of the organization's structure. The same immoral looting of the organization in favor of Computron being exhibited in the Colombia and Europe cases had been practised against the organization generally.

The out-of-pocket damage is only part of the picture. The total payments from the organization and its vendors to Computron over a twelve-month period from November 1979 onward was just under $1 millions, most conservatively, of which at least a half-million was unjustified. This involves payments and accruals in excess of payments. Contrary to Costas' and Andy's lying, at no point was there a net postion accrued in favor of Computron in the balance of such flows. Naturally, the connection between accruals and payments-crises being time-determined, the full impact of the crisis of unjustified accruals to Computron hit the organization and its principal vendors during the September-December period, with effects of a variety known to every vendor and to every part of the field organization.

Without this looting, there would have been no painful cash-flow crisis during the latter half of 1980. On balance, all of the flow of unjustified payments to Computron by the organization and its vendors was to subsidize the greater margin of cost for sheer, non-software-related mismanagement by Computron.

It should be emphasized that there never was a proper business purpose involved in subsidizing Computron with unjustified business payments—in the interest-free banking for Computron by the organization and its vendors. A copy of the business proposal being circulated by Computron—for which foreign trips each costing up to tens of thousands of dollars have been repeatedly made—received from a source solicited by Andy T., shows that he has been peddling a deal seeking 10% of a project for $3 million which has a competitive value such that $3 millions would be worth not less than 75-85% interest. This view is shared among a variety of persons representing aggregately typical leading investors in the United States, including those with decades of experience doing business in the Middle East. The estimate of Andy's proposition in the business community is that he is a "bull-shit artist" and a "paper-hanger," who has been repeatedly turned down essentially on an unfavorable appraisal of his character as a businessman. That has been the consistent appraisal received from a number of leading business people.

We must share that estimate of Andy's dealings outside of the software area.

What has been happening is that Andy's propositions have been turned down flat at inception by nearly all business contacts he has approached, except by persons linked to "Dope, Inc.," who continue to string him along, trip after trip, without ever making a definite commitment. Simple: no businessman in his right mind would accept Andy's 10% for $3 millions offer. They would (and have) reject him at first presentation. However, certain interests have been stringing him along, after all legitimate contacts have rejected his proposition. These latter contacts are all persons directly allied to forces which are dedicated to the stripping of the organization and its principal vendors. That is the project the organization has been underwriting! That is the end to which Costas and Andy connived to loot the organization by deceit.

This self-esteemed "world-class business operator" albeit one of the worst "paper-hangers" and "con-man" personalities known to our experience—after examining some of his business arrangements, is nonetheless a foolish little sardine swimming among real sharks, who have been playing with him and laughing at him, because they will to perpetuate the arrangement under which he and Costas were looting the organization. Apart from the damages traceable to out-of-pocket losses, there are principally two other kinds of damage.

The first of these two is the loss of income. For example, but for this swindle, three books would have been on the streets during October and November: *The Ugly Truth About Milton Friedman*, the Khomeini book, and the new edition of *Dope, Inc.* Just as the looting of WorldComp back in 1978 grossly damaged the firm's operating capabilities and income during the following period to date, so the looting of the organization and its principal vendors destroyed significant portions of income-producing capacity.

The second class of damage is psychological.

Our political capabilities have significantly improved over the course of 1980, while our influence and scope of outreach has expanded geometrically. Both political-intelligence and security operations have produced outstanding accomplishments. Except as essential political functions were looted by administrative policy, the quality of political output and effectiveness of that output have been greatly increased over both the two-year period and the 1980 period.

The political problem in the organization is located in the effects of the spill-over, through Costas' direction of administrative functions, of the same, immoral, apolitical policy Andy maintains within Computron and attempted to impose upon both WorldComp and PMR beginning the Autumn 1978. Later, Andy attempted to move into to take effective control of FEF in the same manner, inhibited by Dr. Morris Levitt's willingness to tolerate only so much abuse from that quarter.

The center of the problem was in New York, where Andy and Costas worked toward developing a Riverdale clique, into which they hoped and worked to introduce a corrupted attitude of "professionalist" contempt for "political" work. Ideas of "professionalism" congruent with the myth of "Andy the professional business genius" filtered through administrative decisions, and also orders barked with venomous, dictatorial savagery, into many aspects of the organization's life. In place of political objectives for deployment, the monetary needs aggravated by Andy's hunger for subsidies were often degraded into an end in itself, even to be served by any means which accomplished such ends.

How silly. A Computron, earning in the order of $2 millions

margin a year, which we have subsidized to the tune of $500,000 or more this past year, has the combined stupidity and arrogance to profess, out of the fulness of its mismanagement of its own affairs, that we who have subsidized it lack knowledge of how to earn money! Not accidentally, wherever a local has been hornswoggled into accepting from Costas et al. some approximation of Andy's nonsense about "sharp business practices," we have seen the fall in income which resulted.

That apolitical corruption is what has to be weeded out of the mind of members directly and indirectly abused by Costas' administrative practices.

Computron Policy

Almost entirely because of the organization's members employed there, Computron is the best software house of its kind in the nation, with the highest productivity and quality of output of any firm. It has other tangible assets, too. Therefore, the firm is susceptible of rational reorganization.

Objectively, the deal Andy is peddling under the proprosal to give 10% for $3 millions could be cleaned up, freed of the sheer bullshit of the extant proposal, and transformed into a viable proposition for $3 millions at 75-85%. On paper, that would extricate Andy from the horrible tangle he has created around himself through irresponsible business practices.

However, no investors would give Andy continued majority control of management in such an arrangement. Andy has skills, provided he is controlled on a firm leash, provided he is in a position to take orders as necessary by persons qualified to give them. Only if Andy surrenders Board of Directors positions to credible persons would investors accept what is otherwise a sound business arrangement of the sort indicated.

If Computron took the course indicated on those two points, a painless correction of the damage done to both the organization, its principal vendors and Computron itself could be facilitated.

In any case, whether that or some other arrangement is to be adopted, we are isolating the Computron problem as a business responsibility of the administrative functions of the national center.

We are going to waste no more precious, avoidable effort or concern on this matter insofar as the organization generally is concerned. Except as we have indicated, the work of the organization is too important to waste any further avoidable efforts on corrupted fools who lack the moral sense to save themselves.

We have been betrayed and swindled. Let us free ourselves from the aftereffects of Costas' betrayal of the human race, hoping meanwhile for his restoration to mental health and morality. Simply rip out of the habits of practice all vestiges of Costas' mismanagement, as indicated, and move on to what is important to be done.

Further Work

During the period immediately ahead, there will be a number of changes beyond those indicated at the outset here. We plan to increase the field deployment of trained organizers by between 20 and 30 in total, to increase the intelligence staff significantly, and the security research functions modestly. This and other gains will be facilitated by rationalization of expenditures for communications and by cost-saving and income-increasing assistance to our vendors.

(13)

Memo January 22, 1981

The [redacted]aRouche-Riemann Model" Problem

From: Alice Roth

It was by no means an accident that on the same day that Costas Kalimtgis was maliciously slandered at a national office briefing, a memo was also issued by Lyndon H. LaRouche on the "Riemannian" model project. I viewed that memo as a deliberate insult not only to myself but to the entire modeling staff and especially to the leader of that project, Uwe Henke.

LaRouche said, "First, it should be reemphasized to all members that every fundamental 'discovery' to be presented through the vehicle of the LaRouche-Riemann 'model' was effected decades ago by me, and was either elaborated or efficiently identified in such sources as 'Dialectical Economics.' Nothing is being done currently but to translate those relatively long-standing discoveries into appropriate Riemannian terms of mathematical physics."

If I had thought that there were no fundamental discoveries to be made in economic science, I would never have undertaken the project. Indeed, as I learned in plunging myself into this work, there is much that is yet to be properly understood in this area and there are few, if any, "pat answers." What was particularly annoying to me was LaRouche's pettiness in claiming that no one could possibly surpass his "1952" accomplishment and that all we mere model staffers had to do was to put it into the correct mathematical form. It's clear that there is a great deal of difference between the initial formulation of an approach for tackling a problem and the actual process of solving that problem. We may have important insights and clues concerning how nuclear fusion may ultimately be realized based on an advanced epistemological viewpoint but we have not yet succeeded in achieving fusion power. I will certainly applaud the person or group of persons who accomplish that feat, and would never dream of denigrating that accomplishment because "LaRouche already made all the fundamental breakthroughts in 1952."

The second point I would like to make is that for many months I was struck by the fact that there was a serious flaw in the model work—namely that there was no room in our model for the "subjective" side of the economic process. Many years ago I was impressed by Rosa Luxembourg's point that this "subjective" side—that is, the credit system or fictitious capital—is just as ontologically real as the so-called objective, tangible side. Was that not the whole point of her devastating critique of Marx's attempt to construct a mathematical model of the economic process? Essentially, the credit system and its development reflects the "creativity" of society's ruling public and private institutions in their efforts to either facilitate or sabotage the development of the productive ("objective") forces. Of course, this is something which evades mathematical formulation just as it is impossible to model individual creative breakthroughs in basic science and technology.

Because our so-called Riemannian model ignored the credit system, it was utterly useless for any kind of work involving short-run developments—i.e., the "quarterly forecast." Yet it was demanded that we constantly produce such projections at a moment's notice for EIR. The best the staff could do would be to first figure out what seemed to be going on *politically* in the business community and among policy circles and then attempt to generate computer graphs that matched our already-arrived at assessment. I found this degrading and intellectually dishonest. We were representing ourselves as one more "delphic oracle" among other competing "delphic oracles." But the tools we were using were even less sophisticated than the Keynesian-Friedmanite rubbish we claimed to be replacing. The

only thing that saved the project was that our political intuition occasionally was more on target than that of the competition.

What was most significant about LaRouche's memo, however, was his insistence that "morality" was the key to the model staff's problems. Yes, morality is the keystone of any scientific endeavor. But LaRouche issued this memo at the very same time that he flew into a *psychopathic rage* against Costas Kalimtgis just because Costas hubristically took LaRouche on concerning the severe financial crisis which was threatening to collapse the organization and demanded an international financial plan.

Last weekend, LaRouche's rage against Costas became homocidal as evidenced by the charge that Costas was a "KGB pawn." This is evil which cannot be compromised with. At the moment I read that memo, I decided to resign and I urge all others to do so.

Internal Memorandum
National Executive Committee, ICLC
January 23, 1981

Following a one-day disappearance, Alice Roth distributed a two-page statement whose only explanation, from its internal contents, is that she was brainwashed in some way. The statement attacks in an eerily irrational way Alice's own deep commitment to her work and the model, and concludes with the wild assertion that LaRouche attacked Kostas because Kostas allegedly "confronted" LaRouche with Kostas' demand for a comprehensive "international finance plan" for the organization. In "I.D. Format," the abrupt personality change represented by this pathetic document, more or less attests the "Chinese brainwashing' method of attack-"therapy" employed by the Rabbi Maurice David circuit associated with Dennis King's past.

Kostas may have been a factor in this, since in his present, "Mr. Hyde" state of paranoid-schizophrenic rage, he would be the sort of person a brainwasher of the David variety would consider an appropriate tool for an "attack" group. The mentally-disturbed Robert Cohen is also involved in this, through Don Roth.

End of Internal

(14)

ICLC Internal Memorandum

Security: KGB Footprints Around Computron

by NEC/NCLC

NEW YORK, Jan. 23—The following urgent security information is for the knowledge of ICLC members only.

Generally speaking, the time for justified anger against Kostas's and Andy's deception and looting of the organization (over the period since October 1978) should be considered past. Too much time, too much effort more profitably devoted to practical work, are consumed by the labor of even those relative few who must clean up the mess Kostas and Andy made of our internal affairs. However, in the controlling environment around Kostas and Computron there are included a predominant role by Dope, Inc., the FBI and its corrupt agents, and a significant involvement of the Soviet KGB.

Since the IMEMO forces, which control at least predominantly the Soviet KGB's foreign-intelligence operations, are currently excalating their attacks against the ICLC internationally, it is urgent that members know how this is reflected in the Computron situation.

1. Highlights of KGB Attacks on the ICLC

The first known indication of an IMEMO-KGB attack on the ICLC dates from February 1973, the first known active phase of the targetting of Konstantine George (Jannis) which led to his attempted brainwashing by East Germany security officials. It is significant that this dates the attacks to approximately one month prior to the deployment of the CPUSA in what were intended to become homicidal attacks on members in Philadelphia. It is also relevant that the FBI was complict in those latter attacks.

This is, as we have stated, the first defintely known instance of a KGB-related attack on the ICLC. However, there were two earlier attacks on Jannis which fit so closely the same pattern that an open book must be maintained for the present on the identity of the forces behind them. One case was a murderous knife-attack, from behind, following a significant achievement by Jannis a very brief time earlier. The other was a case of serious food poisoning, in which Jannis and Luba were the only restaurant patrons affected.

For such reasons, we have classed Jannis' present, severe illness as "suspicious," pending a change of classification of its etiology from the present "cryptic" category.

During a more recent period, there was a pattern of harassment directed against about forty members working part-time or full-time in the composition trade. Although the authorship of this dirty operation focussed investigations on convicted Col. Zvi Aldouby and his Dope, Inc., connections, the harassment was all of one piece with the cases of Jonathan and Kathy Leake. Not only did Jonathan avow that the contamination of him was Soviet, the operation was in fact run through a Soviet asset, an asset which also approached us with the offer to produce Brezhnev's memoirs.

The overall pattern of KGB actions against the ICLC is instructive.

From February 1973 into the end of 1973, KGB activity against us was focussed on the option of assassinating LaRouche, as FOIA releases indicate, and as the movements of Puerto Rican terrorist friends of Jose Torres' family indicated to us then the first on the list of probable evil-doers serving Gus

Hall's whims in the matter. From late January [redacted] until October of November 1977, there is a very low profile of threats from IMEMO and related sources, and no indication of such involvement in the August 1977 targetting of LaRouche for assassination by the Baader-Meinhof gang.

As of either October or November 1977, the IMEMO deployment is visibly aversive, including a level and intensity of public attacks without precedents.

The pattern of attacks against the ICLC by IMEMO and allied sources correlates with the ebb and flow of IMEMO's successes in bringing Soviet foreign policy into congruity with both Willy Brandt's Socialist International and relevant elements of British intelligence and finance. This intersects the ebb and flow of the factional situation inside the East Bloc. This aspect of the matter is generally understood clearly enough by most members, and need not be restated here in further detail.

There is a second dimensionality to this business, of which members are generally aware, at least in broad terms, but perhaps not in sufficient detail. It is to that second matter that we turn focus of attention next.

2. Caught Between Spooks

Our Autumn 1975 evaluation of the implications of the Hilex '75 NATO exercise had two immediate effects. Generally, within the intelligence community, it produced a startled recognition of our unusual quality of intelligence-evaluations capability. The FBI exploited that fact to argue that we could not conceivably have discovered such an accurate assessment of Hilex '75 unless we had either purloined "Cosmic" documents from NATO Brussells headquarters, or had such information slipped to us by the Soviets. The FBI used that argument to run a top-secret, international harassment operation against the ICLC under code-name "Kwaterbak."

The second result is more interesting. Knowing that the FBI operation against the ICLC was nonsense, that there was no KGB control over us, some of these gentlemen began evolving a grand game.

Since we represented an extraordinary private political-intelligence capability, it was not difficult for certain gentlemen in the intelligence community to convince the Soviet leadership that we were a CIA operation, and to convince credulous, unwitting members of the Western intelligence-community that we "must be KGB." Although this two-way deception-operation did contribute to the containment against the ICLC, there was another purpose, other than containment, involved.

In brief the Soviet KGB responded to us out of their induced conviction that the ICLC was a special, high-level kind of CIA asset or operation, and to cause information to be transmitted in our direction on the assumption that our address was a special channel for communicating policy relevant information to top policy-making circles of the U.S. intelligence community. Naturally, since we always evaluate and put our own construction on any interesting policy-relevant information gathered, leading policy-making circles of the intelligence-community could read our assessment of such information gathered in New Solidarity or the Executive Intelligence Review, and obtain the raw information through the massive National Security Agency tap on all our mail and telecommunications internationally

In view of the fact that the quality of our performance in political-intelligence work corresponds, at least, to the quality of the best private or official agencies—if not in quantity, it was not difficult to convince the Soviets that we "must be CIA," or to convince unwitting members of the western intelligence community that "they must be KGB." More recently, much of the illusion as worn off. Only a few fools still take seriously the libel that we are linked to the "KGB." Although our interface with personalities of the intelligence community is obvious enough, few are silly enough to imagine that we are CIA assets, or, indeed, anything other than we profess ourselves to be. For a significant period, however, the belief of the unwitting that we were either KGB or CIA was widespread in intelligence circles, a widespread delusion which was not without significant consequences for the spook world as a whole.

So, a total National Security Agency mail and telecommunications surveillance was placed over the ICLC world-wide. Our intelligence was tapped daily, chiefly in this way, and larger or more concise excerpts were relayed from NSA to scores of authorized recipients daily.

A "dog and pony show" was arranged to cause the Soviets to presume that we must be a very special quality of CIA operation. The relevant smiling gentlemen in the intelligence community then sat back waiting to see how the Soviets would react to this deception. This was particularly significant during the period the Carter Administration was destroying most of the bridges built up between the U.S.A. and Soviet intelligence and military communities over the years. We appeared to be the potential open channel to which a Soviet representative or news service could pass policy-relevant information into high-level channels of the U.S. intelligence community. Indeed, always out of the blue, so to speak, we were passed that sort of information on Soviet initiative. We transmitted it from Europe or elsewhere to New York, knowing that the NSA would have passed the information to the relevant circles in the official intelligence-community before it reached Nancy Spannaus's hands in editorial. On a number of occasions, there were early reactions delivered to us from the intelligence-community side which proved without doubt that the NSA telecommunications intercept had been made and forwarded in exactly the manner we supposed.

Naturally, there were occasional efforts to "play us." We made it clear that we would under no circumstances follow a policy with which we did not independently agree, and the efforts to "play us" stopped in the main. The essential point, on the game-master's side, was that it was neither useful nor necessary to attempt to bring us under control for the purpose of the game being played. As long as some slow-thinking folk believed that we were CIA, and some other foolish folk believed that we KGB, our mere continuing our own policy of independent intelligence-work kept the game on the field.

There was only one qualification to this. Some folks who were witting of the game assessed Kostas and Andy as "potential KGB assets." Unlike the FBI's meatheads, these gentlemen knew the truth about Kostas. However, they did assess Kostas and Andy as the two persons in the organization's influential circles who might, under some circumstances, be influenced by the KGB. Therefore, they viewed the classification of Kostas and Andy under "counterespionage/foreign/KGB/Athens" as merely a considerably exaggerated evaluation of a mere potential tilt.

Therefore, within the overall grand game being played, Kostas and Andy were players of special significance. They were viewed as persons who, together, might seek to open a certain kind of contact to the KGB under certain kinds of circumstances. Not because Kostas was viewed as having a witting intent to do so, but because the potentiality for developing such an intent was estimated to be included in their overall psychoprofile and their KKE-oriented sense of "Greek family identity."

That would not be a ridiculous assessment of [redacted] potentials. As long as Kostas continued to be morally self-defined within the body of the NEC and NCLC more generally, this potentiality was nullified. However, most intelligence agents are, virtually by definition, apolitical persons. They are political only in the sense of "family loyalties," rather than independent political process of judgment. A former Communist, raised in a Communist family, but turned apolitical, and concerned with matters of "earthly paradise" is the sort of personality the KGB could "control," whereas independently political people, who can not be such dutiful zombies, are intrinsically unstable under control.

(16)

That, we must assume, would also be the assessment of Kostas' and Andy's potential from the side of KGB recruiters. If such recruitment has not occurred, it remains likely that an attempt at recruitment would be made. If such a recruitment were attempted, it would occur with the blessings and environmental assistance of the FBI.

This, apart from the special case of Kostas and Andy, defines broadly the second dimensionality of IMEMO-KGB interest in running operations against the ICLC. We are currently still viewed by the KGB as an important, special sort of asset of either the CIA or of some section of the military side of the U.S. intelligence community. They will tend to act against us accordingly.

3. KGB Links To Computron

The KGB has a twofold significance for Kostas and Computron. First, the characterization of Kostas and Andy as subjects of "counterespionage/foreign/KGB/Athens," is the only aspect of the ICLC membership which is documented as still subject to such an aversive classification. This means that the FBI, ONI, et al., can "legally" run dirty operations at and around Kostas and Computron which are outlawed under present guidelines against all other targets associated with the NCLC. It is true that the FBI does run dirty operations against the NCLC through its officially-classified "agent in place," the Anglopagan Defecation League (ADL), but in that case the ADL does its evil under private cover. The KGB is also a very real problem for Computron in its own right, as well as a pretext for the FBI-ADL operations being deployed.

One employee, in particular, is a member of the political-cover organization for the Armenian Secret Army. This mother-organization's conduits in the United States are long-standing joint-assets of the FBI and KGB. Another instance, in Paris, intersecting both Computron and this particular employee, is a private front-organization of long-standing for the KGB.

Although Andy has already been delivered conclusive evidence of the existence of this problem as a problem, no significant action has been taken to deal with this on his side up to this time. This and related problems have been stalled for approximately a month and a half.

This KGB contamination is only a dirty part of a picture that is immensely soiled all over. Among all Andy's active contacts outside software matters, he is being played like a yo-yo by financial and other interests which are either witting, Dope, Inc., adversaries of ours, or equally-evil allies of Dope, Inc. in respect to terrorism and other filth.

The reason for this is largely explained by the old saw, to the effect that the best target for a swindle is a confidence-man. In business matters, Andy is, on record, a completely immoral chiseller and worse. In such matters, his mind is never able to acknowledge the existence of reality except form the depths of a manic-depressive's depressive cycle. He operates on the basis of fantasies, fantasies directed to bamboozling persons with whatever mixture of [redacted] truths and outright lies will, according to the fantasy, talk the victim into doing what Andy desires. Reality for Andy is the reality of being able to tell wild stories which can swindle dupes who believe such stories into doing as Andy wishes.

Over the recent two years, that mental problem of Andy's has manifestly become progressively worse.

There are three key features of the overall pattern by which Andy has plunged himself into his present embarassments. *1.* Relying on looting of NCLC assets as a major source of capital for such expenditures, since October 1978, Andy has been dipping into the resources of NCLC to fund his investment in developing and promoting a word-processor, Rather than facing reality respecting the needed capitalization of such a venture, Andy, with Kostas' complicty has beome addicted to dipping into the resources of the ICLC to cope with each emergency caused by his gross mismanagement of Computron. His moral defense of such practices is that what he has extracted from the ICLC, chiefly with Kostas' complicity, falls into the category of "lawful prey." His last defense against the charge of using deception to loot the ICLC is caveat emptor. *2.* He had developed a fantasy concerning himself, that he is a "world-class business operative," in the footsteps of Onassis or Niarchos. He is, in such matters, really a poor little sardine pretending to be a shark. No amount of evidence of his incompetence in management, or of his dubious nature of the devices by which he paints himself a brilliant operator, dents the delusion that he is the equivalent of a "world-class yacht." *3.* In keeping with his obsessive fantasy-life, he has been peddling a proposition which every honest investor rejects immediately, but which Dope, Inc.-linked adverseries of the organization continue to go through the motions of encouraging him to pursue with them.

The crux of the deal is this. According to a proposal outlined by Andy and presented to a member of the notorious Triad group over the signature of "Special Project Director Kay Kasberian," Andy has been soliciting $3 millions to purchase 10% interest in project, for which the probable value would be at least 75% of the project, out of which Computron software would be paid about $1 millions and would also have a 15-25% interest in the shares of the endeavor. Naturally, every honest prospective investor has turned him down promptly. The Dope, Inc./-linked crowd teases Andy along, playing him like a yo-yo. Numerous trips costing tens of thousands each for Andy and other Computron representatives, have been thrown down the sink-hole in this lunatic pursuit of an obsession. In net, the NCLC paid for this out of resources looted from the ICLC with Kostas' complicity.

There are other aspects of this overall matter which the NEC has chosen not to report, chiefly for the sake of Andy and other more innocent owners and employees among Andy's and Kostas' dupes in this matter. It is fair to say, that no investor with business experience would make any investment of any kind in Computron as long as Andy remained President of the firm or a majority stockholder. Andy's track-record, as shown by any reasonable audit of transactions, would lead any experienced investor to insist that Andy's executive control over the company and financial holdings be generously subordinated as a precondition for assistance.

Apart from software, Computron has not a single honest prospect of business or investment, and he is operating amid the shards of his aggravated mismanagement in an environment controlled by Dope, Inc., the FBI, Roy M. Cohn, and the Soviet KGB. On the basis of lack of manifest morality in business transactions, his refusal to make peace even with the friends he has looted by deception when that is offered, the probable course of events is that Andy would go down in the shattered pieces of one

last grand scam-effort rather than come to his senses to adopt a sane course of action. Unfortunately, this occurs in an environment in which all sorts of adversaries of ours, including the KGB, would be easily capable of pulling poor Andy's string. At this point, Kostas would encourage that—since the ICLC is no longer willing to be scammed, and the FBI would go into whatever passes as a substitute for fits of laughing with joy where the KGB to be approached in that way.

In this circumstances, the NEC must act not only on the basis of the ugly, immoral picture documented before it, it must also act on the basis of the obvious security-contingencies embedded in the situation.

4. Kostas As A Security Risk

Kostas' mental state is visibly degenerating rapidly, reached the level of death-threats against several named NEC members. This is in keeping with the oedipal rage he has acted on in the past in brutal beatings of his son. Since the manic-depressive cycle is based on oedipal rage, and since Kostas is currently in a downward spiral of paranoid-schizophrenic degeneration of his personality, the oedipal rage will increase in intensity, and in shaping his judgment. The KGB is an oedipal cathexis for Kostas. A well-defined security risk exists presently on that account.

(17)

January 24, [illegible]
The National Executive Committee
National Caucus of Labor Committees

It is with great sadness that I am submitting this resignation from the International Caucus of Labor Committees. I have delayed this action until now in the hope that, somehow, the NEC would find the courage to deal with the LaRouche problem. It is clear to me now that this will most probably never happen and that the organization is currently morally bankrupt.

What morality can remain in an organization which permits one man to scapegoat his closet collaborator for carrying out those policies which he himself initiated? What possible excuse can be made for allowing Costas Kalimtgis to be crucified by a howling mob of looted members, in order that a catharsis could be safely directed away from the man whose policies had caused the problems in the first place.

No one can any longer remain in the ICLC who is not a coward, a sycophant, a liar, a fool, or some combination thereof. Mr. LaRouche has insisted that the membership accept as true what they know cannot *possibly* be true. They must deny the existence of an article in the August 22, 1978 issue of New Solidarity as an oath of personal loyalty to Mr. LaRouche. They must accept as plausible that Mr. LaRouche can know as his closest collaborator for a decade a man who becomes a moral imbecile over a period of more than two years, and that this can totally escape his notice, while at the same time proclaiming Mr. LaRouche to be posessed of the greatest psychological acumen of any person alive. If no other evidence was presented, the timing of this Jacobin catharsis alone--following Election Day and preceding Inauguration Day—would cause any person with a mind to wonder at the convenience of the period chosen to effect this operation.

For anyone to replicate the drivel arising from Mr. LaRouche's recent series of "memos," either because he forces himself to believe it or because he feels that circumstances force him to mouth it for expendiency sake, is to degrade him or herself to such a degree as to render him or her unfit to be called human.

I am ready at any time to rejoin this, or any other, organization which can deal with this problem. I have but scant hope, however, that this organization can do so.

Sincerely,
Eric Nelson
(signed)

January 26, 1981
To: The National Executive Committee, and NCLC membership
From: Anne-Marie Vidal Sawicky

(18)

I joined the National Caucus of Labor Committees in January 1973. I was originally motivated to join because of an intense intellectual atmosphere which was concretized in programmatic organizing to build a class-wide movement. I have always considered myself a loyal cadre and a good organizer. Like any other NCLC member, I have endured physical and financial difficulties during my membership. These I neither regret or bemoan; I never fooled myself that being a Labor Committee member would be easy.

I did, however, expect that as an LC member that reason and morality would be the guidelines in any internal or external political discussion. The recent series of memos written by Lyndon LaRouche are a violation of reason. LaRouche has subjected Costas Kalimtgis to a trial by memo, having pronounced Costas guilty without bothering to produce evidence. LaRouche's tactics would make Mao's Cultural Revolutionaries blush. But more seriously, LaRouche has cynically destroyed that very moral and intellectual atmosphere he sought to create. At the present, an LC member in good standing must swallow whole LaRouche's claims that Costas is a paranoid schizophrenic, Andy T. is a thief, and Alice R. has no independent mind.

It is hardly original for a leader of an organization to deal with inquires or skepticism by sounding the alarm of "intelligence agency's dirty tricks" to inspire the membership to complete obedience. This has been the case in totalitarian organizations before; it is the case in the Labor Committees now.

There is a hideous immorality in LaRouche's manipulation of the NCLC membership. There is an cowardly lack of morality in the NEC's response. If I were to accept LaRouche's lying assertions of Costas' insanity or Andy's thievery, I would have to admit that the NEC stood by and watched themselves be robbed. This would hardly be indicative of world historic leadership. If Andy and Gus are being slandered—which I emphatically believe—the NEC is cowardly in not informing the membership of the truth.

Because the NCLC no longer exists as a humanist organization capable of building a political movement, I resign. This has been a difficult decision but the only appropriate one under the circumstances. I urge all members to take the same action.

Anne-Marie Vidal Sawicky
(signed)

(1/26/81)

Open Letter To Lyndon H. LaRouche, Jr.

Dear Lyndon:

Last week I received an abusive phone call from Jeff Steinberg who in the course of the discussion harrangued me about Bob Cohen's "pimping" (for me!) and my "factionalizing." My wife has also beeen repeatedly confronted with such abuse. I wish to reassure you and others that I would never degrade mayself by allowing myself to become the instrument of enemy efforts to demoralize or destroy the membership of the organization which I spent so many years in building.

I shall always retain for you the same respect I had in 1968 when in the course of a single lecture you communicated the connection between creative mentation and the lawfulness of expanded reproduction in a way that resolved for me the most crucial problems that I had been grappling with for several years. Furthermore, your independent discovery, which allowed you to develop economics as a science and the further elaboration of that discovery through a political process which you initiated is a matter of history. These accomplishments are not subject to opinion or to rejection on my part due to ephemeral disagreements on other matters. If, therefore, others, be they misguided individuals or agents, choose to "rally around" my person, I hope that you will spare me the humiliation of ascribing to me the responsibility for such an occurence.

I must nevertheless inform you that I have been under continuous pressure to respond to your memos by very responsible members who interpreted my silence as a sure sign of guilt. They could not understand, nor did I dare to explain to them that I had realized from early on that any attempt on my part to defend myself would be met by the most virulent outpouring of McCarthyite-like indictments. I concluded that once such a process was unleashed, the ICLC would become prey to a variety of operations despite our intentions.

My worst fears of what could happen should I have defended myself were nothing compared to the harm you did without the benefit of any response or provocation from my quarter. I shudder to think what may have ensued if I had allowed myself to be swayed by those members who demanded that I either defend myself or in silence be found guilty.

Lately I have been repeatedly amazed at your miraculous ability to weave rumors, lies, facts, half-truths and international developments to suit your purpose of the day.

It is the same disregard for truthful facts that characterizes every piece of filth that you have circulated about me. You accuse me of attempting to strip your security during the Democratic convention even though you knew full well that I was incapacitated at the time, with absolutely no power to determine policy even if I had chosen to. Again you lie when you charge that I chased business ventures and used the organization to that end when you possess all necessary knowledge of how I repeatedly tried to sell off future business assets, and business ventures to meet our immediate political and security needs.

I find it too tedious and demeaning to defend myself against every new lie which you and your minions concoct on a daily basis. I have lived my entire life according to a dedication to humanity which my parents instilled me with. I have been active politically towards that end since I was 12 years old. I have never benefitted nor have I sought benefits according to the standards of banalized society. Under no circumstances would I, or could I be influenced into making political decisions based upon "family, sex or money" consideration. I would prefer suicide

before resorting to such degradation, and indeed my record in the organization is a testament to that [redacted] no matter how much slander you circulate in order to obliterate that truth.

(19)

Your actions over the past two months have proven to me that even though you are of great accomplishment in the realm of science and philosophy you are deficient in statesmanship. You lack an indispensible quality Plato calls 'sophrosene,' a term usually mistranslated as 'temperance.' You have made yourself a prisoner of a cult of infallibility around your person, and you have manufactured a chain of security rationalizations to prevent discussions on any matter, even on the most inconsequential detail, whenever such a detail threatens to pierce the cult of your infallibility.

On any such occassion you resort to alternatively bludgeoning (and stroking) the individuals involved until they submit, often by using the most despicable modes of psychological manipulation. Despite your commitment to truth in other matters, you find it appropriate on those occassions to rewrite history and to lie lest you be proven wrong. That is why you did not have the capacity to retract the lies you uttered when you returned from Germany. Though I gave you no occasion to find fault with my conduct—since I remained silent and isolated—you became even more obsessed and wrote memo after memo and thus became prisoner to your own lies. Each new memo with its fresh findings was written—not to me, but in response to some member who had been foolish enough to express some doubt; doubt which was then reported to security and which you felt compelled to respond to by inventing more extravagant slanders and crimes. First, you called me a liar, a thief, classified me as clinically insane and because there was still doubt in the membership it was only natural that the next step was to connect me to some form of agentry. You have thus created a situation which has left no alternative for me but either accept your infallible falsifications—accept that I am insane, immoral and have been so since the fall of 1978—or to resign from the organization.

I have chose to resign, because it is my responsibility to do so. I can not allow you to create a precedent whereby anyone can be subjected to charges of insanity, and backroom frameups because they choose to disagree with you in an honorable and proper way. Furthermore, I will not fall into the trap of defending myself against charges which could put members and even yourself in legal jeopardy. Unlike you Lyn, I do not say to myself that "even if I were put before 10 grand juries I would tell them that I knew nothing..." You have rejected every appropriate forum within which I could have presented every sensitive fact. You also knew that I was not about to make a public presentation of material that could irrefutably clear me of all your malicious charges, but would ultimately be used to bring harm to many members and to the organization.

If I had chosen to follow your method and to irresponsibly react out of honor, pique or self-righteousness that is what I would have done. However, over the years I have acquired, no doubt inadequately, approximations of that quality 'sophrosene' which you totally lack. I have also learned to couple that quality with a deep respect for people who despite their problems, have made sacrifices to the organization—(unlike you Lyn, who out of personal vendetta can within 24 hours degrade such people and liable them thieves, traitors, and agents.)

In that sense, despite your greatness you could not have founded the American Republic, nor could you have risen to the heights of Lincoln's statesmanship. I am afraid that you will never develop those qualities because of your psychological need to surround yourself with people who must at all time feel compelled to pay homage to your infallibility, and to even amplify your errors in these matters despite their better knowledge.

I am not bitter, depressed or existentially enraged as I follow each day's outburst of slanders that paint me as the new Satan for the benefit of the gullible. Nothing that you write Lyn can hurt me or surprise me any longer; for once the corruption of malice and lies spreads, it creates an environment from which no good can come. I am only deeply distressed at the effect this has on the membership whose power of judgment is the most important asset of the human race. We have seen repeatedly in this century the pernicious effect that big lies have had on the powers of reason of the citizenry, on whose powers ultimately the development of civil society depends.

Once the members believe that our financial difficulties during and immediately after the campaign resulted from thievery; or that the poor NEC was destroyed by me beginning in 1978; that there was no campaign because evil Kostas was stealing money.....then the membership despite its greatness will have committed moral suicide.

I wish you the best and hope for the successful implementation of the principles and policies of the ICLC.

Good-bye
Kostas
(signed)

Report on Status of National Organization

Lyndon H. LaRouche, Jr.
January 29, 1981

Since it is physically (i.e., financially) impossible to convene a delegated national convention at this time, some brief summary report of the current state of affairs is in order.

On receiving conclusive evidence of Kostas' deranged state of mind, I returned to the United States from urgent work in Europe, announcing that I was assuming direct responsibility for administrative affairs. My first actions were to assemble the National Committee, and on the basis of that action to reassemble the National Executive Committee as a functioning deliberative body in respect to administrative, as well as political affairs.

Apart from the fact that we have suffered very serious financial damages as a result of worsening mismanagement of administrative affairs over many months, and apart from a relatively tiny proportion of members who still refuse to accept the implications of very clear and ultimately simple facts, the direction of the national organization is presently in better condition than ever before, an improved quality significantly evoked by the sensed need to respond to what was potentially a very serious, extensive damage to the organization.

Although it has been necessary to deal with the concrete destruction wrought by Kostas K., the necessary focus upon that concrete problem and its immediate correlatives must not obscure the fact that these developments were caused by a still-continuing operation coordinated through the Fabian Bureau of Investigation—which has been deployed against the organization, according to FOIA records, since 1968. The role of the ADL, which began its operations against us openly in 1974, is and has been essentially a reflection of its current official status, as an "agent in place" of the FBI. The overall background to this matter is adequately summarized in the public attack on the Chicago Sun-Times.

To understand the FBI's part in this one must peek at highlights of the dossier on the FBI being assembled by the security staff.

Although the FBI has adopted criminal-ju[illegible] functions, even the substance of such "gang-busters" activities has been chiefly a matter of making credible a certain needed camouflage, the manufacture of a certain public-relations image, whose function was to conceal what the Bonaparte BOI set out to be from the beginning, a "right-wing," social-democratic "Gestapo" in the United States.

(20)

This continuing, underlying character of the (text illegible) by the "Federal Witness Invention Program," and the deployment of that FBI-directed branch of organized crime in the abortive effort to smear Secretary of Labor-designate Donovan, with naked complicity of Senators Kennedy and Eagleton and a leading foul role by FBI-trained Walter Sheridan. Presently, the FBI is working in collaboration with the Ramparts-Mother Jones Collective gang, including the familiary Bo Burlingham and Andrew Kopkind, in spearheading the William Safire-initiated "mafia" reagangate effort through the corrupt news media.

Robert Cohen, enraged by his wife's inability to endure his semi-psychotic fits of brutality any longer, repeatedly admitted his collaboration with "Gay" Edgar Hoover crony Roy M. Cohn in conjunction with the New York Times and Our Town, admitting that he helped to develop many of the specific lies used by those corrupt publications. Recently, Kostas has been in collaboration with Robert Cohen, as well as with Cohen associate, former LC drop-out and "sleeper," Don Roth. This merely exemplifies that what Kostas has done against the organization he has betrayed was done in an environment controlled by the FBI and the FBI's wicked accomplices.

Unlike Don Roth, this betrayal of the organization increasingly over many months, created an increasingly irresoiveable conflict in loyalties within Kostas, who went insane under such increasing stress.

The point is this. Although it is necessary to deal appropriately in practice with the damage done by Kostas' betrayal of the organization, this must not cause us to lose sight of the fact that that betrayal has been merely a predicated, relatively ephemeral feature of the continuing problem represented by the virtually treasonous FBI.

In fact, the FBI is the enemy of the United States and its Constitution.

It was the FBI, together with the ONI, which collaborated with assets of the Socialist International to destroy the effectiveness of "Gay" Edgar Hoover's long-standing and dangerous competitor, the Central Intelligence Agency. The business is more complicated, as the report on the Chicago Sun-Times illustrates, but the direct and witting complicity of the FBI, ONI, IPS, and the Kennedy crowd, as well as Kissinger and Haig, is specific and undiluted, despite the larger context of those activities.

It was this same crowd which engineered "Watergate" from beginning to end.

It is the exact same crowd, including the enemies of the United States within the FBI, which is currently engineering the attempted "mafia links" Reagangate operation.

Together with FBI we include the heritage of attorneys-general Ramsey Clark and Nicholas deBoer Katzenbach and Benjamin Civiletti, as well as Ed Levy, Patrick Murphy, et al. This is the combination, collaborating with the forces of Willy Brandt's Socialist International, which formed the crucial betrayal of the United States in connection with the Khomeini coup and the seizure of U.S. hostages.

It is the same elem[illegible] of the FBI and corrupt collaborating elements of the Department of Justice which destroyed the drug-enforcement and related capabilities of the Federal government—as well as every other aspect of Federal law-enforcement which has been co-opted by the FBI.

It is the FBI which led in the effort to cover up the Permindex connections to the assassination of President JFK, the same FBI and ONI whose "SIS" operations of the past were coordinated by the same Major Louis M. Bloomfield who headed the Permindex organization in cooperation with Hitler protege Ferenc Nagy.

We know the relevant elements of the FBI to be as treasonous as Benedict Arnold and Aaron Burr, accomplices of the same master as Arnold and Burr in their time. We know the FBI to be the principal official predicate of the betrayal of our nation as well as the official conduit for every dirty operation run against us with complicity of official institutions since 1968.

Although the Reagan administration has numerous Trojan horses within, including the Heritage Foundation asset of the Socialist International, Kissinger such as Haig and Allen, and the Kemp-Wanniski "delphic" crowd self-implicated in the effort to launch "Reagangate," it is the role of the traitorous elements of the FBI and Justice Department which is the key pivot in all the evil operations afoot.

It is urgent that the sensuous immediacy of the internal sabotage effected by Kostas not distract our attention and energies from deploying to clean up the enemies of the U.S.A. hiding behind the status of the FBI.

The NEC is more or less fully aware of this nature of our larger problems and is focussing its efforts accordingly. The shaping of policy-decisions and related practices in respect to what might appear otherwise as isolated matters is governed by that perception.

Granted, various corrupt, immoral private agents such as the ADL are most visible in wickedness deployed against us. The official mother of that wickedness is not those private agencies; those private agencies, like FBI official "agent-in-place," the ADL and its "Irwin Sewage," are essentially fronting for the FBI, for the degenerate heirs of "Gay" Edgar Hoover.

Memorandum of Agreement

(Undated, issued approximately January 30, 1981)

The Chairman of the National Caucus of Labor Committees, Lyndon H. LaRouche, Jr., has issued a number of internal memoranda to members of the International Caucus of Labor Committees. He has done so on the basis of information and facts which Andy Typaldos, President of Computron Technologies Corporation, believes to be partial and to include misinformation and with interpretation he disagrees.

Furthermore, Mr. LaRouche has repeatedly stated his wish to assist Computron insofar as this does not conflict with his responsibilities as Chairman of the National Caucus of Labor Committees. There have been disagreements between Mr. Typaldos and Mr. LaRouche concerning the best choice of course of action in the mutual interests of both organizations.

Any written statement contrary to the foregoing statements is implicitly detrimental to the separate interests of both Computron and the National Caucus of Labor Committees, two friendly but properly and legally independent organizations.

Mr. LaRouche wishes to emphasize the proper reading of his meaning in the memoranda in order to avoid derogatory character interpretations, while Mr. Typaldos also wishes to emphasize that he deplores the use of misguided defenses of his character and his actions to fashion attacks against the organization that he supports and continues to belong to. Mr. Typaldos' disagreement with Mr. LaRouche on political and methodological questions regarding their common organization, the NCLC, which they both care to defend and protect, have been discussed with Mr. LaRouche, and may at Mr. Typaldos' option be subject of an internal memorandum to add to the internal discussions of the organization.

Lyndon H. LaRouche, Jr.
(signed)

Andreas Typaldos
(signed)

(21)

ICLC Internal Memorandum

Budgetary and Financial Policy

New York, Feb. 1—Financially, the organization is passing out of the seasonal short-falls of the year-end with two continuing problems. The first of these, the "objective" problem, is the effect of the looting of the organization's funds and infrastructure at the direction of a man who was going progressively insane, Kostas K. The second of these, the "subjective" problem, is the difficulty some members experience in coming to grips with the implications of the hideously immoral acts Kostas conducted during the post-November 1977 spiral of his growing insanity. Apart from external dirty tricks against the organization, it is the second problem which is the principal cause for an aggravated marginal shortfall in field income.

Under these conditions, the clear and uncompromisable budetary and financial policy is that the production and distribution of intelligence through the medium of distribution of publications is a matter of absolute, uncompromising priority. To illustrate the principle, if it were necessary to eliminate every regional telephone-expense in the organization in order to deliver subscription literature on time, that cutting of telephone outlays would be done without any entertaining of discussion.

At present, we have eliminated the theft and mismanagment formerly occurring at Kostas' direction. The financial management is overall excellent, within the limits determined by temporary seizure of blockheadness in some parts of the organization and associated entities. At present, the sole determinant of the amount of funds available is the level of sales performance in the field. That performance is running $25,000 a week below what it would be without marginal blocking in the field, and $15,000 a week below what is tolerable for balance.

The national must balance overall priorities, and will not be drawn into debates concerning pleas for individual exceptions to budgetary and financial priorities. Either the overall income-performance is increased, or regional telephone outlays will be drastically cut as a beginning of the process of trimming outlays to the level of sales performance by the field.

Granted, it is paradoxical that such a discussion of policy should be required in view of the massive expansion of the political openings generated by the 1980 campaign. Nonetheless, because a margin of the membership has been reluctant to face the full truth of Kostas' playing NC members against NEC members, and one NC member against another, a certain portion of the membership corrupted into aiding such dirty games against NEC members or other NC members has lost a margin of moral confidence in itself. It is the lingering corruption associated with past complicity with a Kostas going insane which is clearly the principal cause for the margin of poor performance.

The Chairman has stated, in this connection, that in the case any member is found repeating Kostas' lies against members—including Carol White, Christopher White,, Fernando Quijano, Allen Salisbury, Criton Zoakos—or against EC or CEN members—he will introduce prompt, disciplinary-action resolutions, no matter who that offender is. Perhaps a few such painful measures will, unfortunately, prove necessary to shock the organization into liberating itself completely from the evil, degraded influence Kostas exerted on many over the period since November 1977, since the IMEMO-KGB launching of its accelerated attacks on the organization internationally.

In brief, the effect of Kostas' resort to the old bureaucratic "KGB methods" he learned from KGB coordinators is the

direct and indirect cause of the internally-caus[illegible]nancial and budetary problems of the present period. If there is any complaint to be made over the necessary implementation of budgetary and financial priorities, blame the sustained poor margin fo field performance. For the poor field performance-margin, there is only one significant cause: the failure to come fully to grips with Kostas' "divide and conquer, KGB methods" for preventing any interference in his looting and wrecking of the organization.

We repeat: the absolute and unarguable priorities are: the maintenence of the production (intelligence, editorial, composition, printing, binding) and distribution of publications, with subscriptions the highest relative priority of distribution. Everything else, except security and other essential matters of the political structure of the political organization as a political organization, has automatically and non-arguably a lower relative budgetary and financial priority.

Therefore, each region and local must immediately increase gross income by 10 percent, beginning today, or the consequences of the continued shortfall in performance must inevitably begin to be felt in the regions generally. Get out there and fight politically against attempted containment; take no nonsense we should not tolerate from any source. Counterpunch; be security-alert for rumor-mongering and other "moral factors" attacks on the membership. Memorialize Gerry Rose to produce good FBI jokes, plus a few good Kostas jokes. Emphasize, please, that we mean *good* jokes.

Enough said. Get at it.

To the NCLC Membership: February 3, 1981

A Method In The Madness?

We are issuing this statement because we feel that the NCLC membership has become overly fixated on the long overdue internal crisis in the organization and has all but ignored the fundamental shift in the external political practice and policies of the organization in recent months. The reader should be forewarned that what follows is solely our own viewpoint and should not be attributred to Gus, Andy, or any of the individuals who have resigned from their positions or from the organization in protest. We do not agree with these individuals on some points and they should issue their own statements, when and if they deem it proper to do so.

In our view, the crux of the problem has been LaRouche's propitiation of the extreme rightwing of the Reagan machine, the Jesse Helms-Joe Coors-Liberty Lobby side of Reagan. The problem was especially manifest in the closing weeks of the New Hampshire campaign but it became even more acute when LaRouche decided to swing the organization behind Reagan's campaign two weeks before Election Day. The membership was then regaled with fantasy-laden tales of LaRouche's and the NEC's "successful" trip to Washington. The Reagan administration was said to have succumbed to the obvious superiority of the NCLC's ideas and programs, despite the fact that *we had failed to mobilize a mass constituency capable of pressuring the administration to deliver on any promise.*

The reality was quite different. What actually happened was that LaRouche's "KGB agents under every bed" campaign contributed to a McCarthyite hysteria among Reagan layers in Washington. Since the inauguration, the *New Solidarity* headlines of December and January have found their way into the mouths of Reagan, Alexander Haig, and Henry Kissinger. Each has charged in [illegible]nt public appearances that the Soviet Union is masterminding every aspect of international terrorism and that "linkage" must be established on this issue to the SALT negotiations.

Reagan described the Soviet Union as bent on "world revolution and a one-world Communist state .... The only morality they recognize is what will further their cause, meaning they reserve to themselves the right to commit any crime, to lie, to cheat in order to attain" their goal. Brezhnev responded through TASS that the President "spoke in an unseemly manner .... Such words can only mean that the people in Washington apparently cannot understand the meaning of the changes taking place in the world (which) are not dependent either on the United States or the Soviet Union." In other words, there are a lot of indigenous socialist and nationalist movements in the world over which the Soviets do not have much control (which is probably a fortunate thing in our estimation, too).

To be blunt, the Reagan administration is plunging the nation into a new Cold War. If not opposed, this will be followed within months by a massive military buildup and a reorganization of the U.S. economy along "sunrise-sunset" industry lines for this purpose. To give just one indication, Caspar Weinberger has just announced that the administration plans to build the neutron bomb and deploy it in Western Europe, and will look into stationing U.S. troops in Israel.

Granted, the Soviet Union's foreign policy during the last two years has been despicable, particularly in regards to its pragmatic adaptation to the Khomeiniac fascists in Iran. The NCLC was right when it belatedly condemned the Soviets for this. But does that mean that the NCLC must fuel "anti-red" hysteria in the U.S., which merely reinforces the Suslov hardliners and compels the Soviets to further their own military buildup? The pro-detente faction in Western Europe no longer has any room in which to maneuver. Reagan's tirades mean that Helmut Schmidt's days are probably numbered. The world strategic situation has taken a dramatic shift for the worse and the NCLC's role in this affair has been substantial.

We expect that the membership will be told that a military buildup is really all right because it will have technological spin-offs that will aid the economy. This is nonsense as the actual historical experience of the U.S. and Soviet Union has shown. A military buildup necessarily favors only a few, selected industries while scrapping all others, since it gobbles up most available capital goods and other resources. Rosa Luxemburg's devastating critique of military statism has been proven correct against all other so-called economists.

A military buildup will also require extremely harsh austerity measures and the destruction of the living standards of the American population. For this reason, the Reagan administration is planning Federal budget cuts, which in the words of Reagan advisor John Rutledge "will role like a panzer division across the desert." Certain Social Security programs, unemployment benefits, food stamp programs, student scholarships, and farm price supports are slated for the chopping block.

The NCLC's response to Reagan's austerity drive has been a politically impotent campaign "against high interest rates." The Reagan administration's response to this has been: "Sure, we want to lower interest rates. We will do so, as soon as we finish wringing the fat out of the economy. By the way, our only problem with Paul Volcker is that he's been too soft in applying his monetarist philosophy."

Certain individuals on the NCLC intelligence staff proposed that the organization extend its "anti-tight money" campaing to a fight to rebuild Chrysler and the auto industry, perhaps

through a program of reconversion to production of farm machinery or mass transit equipment. Such a campaign might have mobilized UAW and other trade union layers and put some muscle behind the NCLC's anti-austerity rhetoric. This proposal was ignored by LaRouche and the NEC, because it would have proved too *offensive* to the Reagan forces they were catering to, both to those rightwingers who oppose any government intervention into the economy as a matter of principle and those "dirigists" who believe Chrysler should be building tanks.

It is still possible to reverse the Reagan administration's drift into Cold War and a vicious military buildup-austerity policy. But it can only be done by mobilizing the traditional Democratic labor and minority constituencies. We believe that under the present, degenerated leadership, the organization is constitutionally incapable of playing such a positive role, and that in fact LaRouche is opposed to doing this.

The crucial question is: Why has the NCLC membership tolerated this for so long? A clue can be found in LaRouche's Feb. 1 internal memorandum on "budgetary and financial policy." The reader need only substitute "Lyndon L." for "Kostas K." throughout this memo to get a proper appreciation of what has been going on. LaRouche has merely employed the old bureaucratic trick of making someone else take the rap for his own political crimes.

LaRouche's use of "jokes" has been an important tool for psychological manipulation of the membership. For years, NCLC members have been subjected to sick "Jewish" and other "ethnic jokes." This has been used to create a "Bettelheim syndrome" among particularly the Jewish and "red diaper baby" members, who were bludgeoned into rejecting every aspect of their parents; and their own political past, no matter how valid. This led to a moral anaesthetization of the members, a splitting of their intellectual and emotional lives, so that they were capable of taking political actions which violated their most basic sense of morality. (For example, one "joke" that circulated went: "How many Jews can you fit into a Volkswagen?" "One hundred. Four on the seats and ninety-six in the ashtray.")

As a result, members were able to tolerate LaRouche's statement in an August 1978 *New Solidarity* article that "only" one and a half million Jews died in the Nazi holocaust. This statement was extremely damaging to the political credibility of the organization, particularly in the Jewish community, where some layers might otherwise have identified with the NCLC's Middle East development program as well as with certain of its domestic proposals. LaRouche's statement set the organization up for the vicious attack by *Our Town* and the *New York Times*. If enough members had confronted LaRouche on this question and insisted on his retracting the statement, the damage could have been contained. In fact, some members did call for a retraction but they did not bring the matter before the general membership and were quickly isolated through LaRouche's psychological smear campaigns. We can only conclude that LaRouche's reaffirmation of the one-and-a-half millions statement is designed to keep the membership in a controlled paranoid environment.

Finally, we must state that there are many fine individuals, our former friends, who feel they must remain within the organization and who suffer under the illusion that they will be changing it for the better. We believe that under the present leadership, this is impossible. Indeed, we fear that these individuals will be compelled to use their considerable talents in the commission of political crimes which they would not even have dreamed of committing even two months ago.

To those who remain, to those who accept the radical bifurcation of their intellectual and emotional being, to those who are willing to wait for an eternity to see "The Evidence" that Gus is "clinically insane and a KGB agent," that Andy is "an embezzler," that Don is a "sleeper," and that Alice is "brainwashed," the warning of the great humanist poet John Keats should be sufficient:

> 'Beauty is truth, truth beauty,'—that is all
> Ye know on earth, and all ye need to know.

We further demand that, if LaRouche is serious about the charges that he has made about us, he publish these in *New Solidarity* and we will promptly resolve this in the courts.

Sincerely,

Alice Roth
Don Roth
(signed)

ICLC Internal Memorandum

Immediate Policy Against Enemy Moles

New York, Feb. 10—For reasons of very important developments today, which will not be reported at this particular time, it is the obligation of the National Executive Committee to meet its fiduciary responsibilities to the membership by stipulating a set of ground-rules which will equip the membership with efficient instruments to dealing appropriately with a network of "moles" developed in the organization under the KGB methods which Kostas employed in a concerted way over a period of approximately two years to the conscious purpose of attempting to wreck the ICLC from within.

First, since every member has been given and has absorbed overwhelming evidence of the hideous character of Kostas' offenses (if not all his offenses), any expression to the effect of alleging that "Kostas has been unjustly victimized by the NEC" will be treated summarily as a lie by the person who makes it on that spot and at that instant.

There will be no extended debates over that matter. The only discussion permitted under those circumstances at that moment is the report by the person repeating the lie of the identity of the person who transmitted such false information, and on what occasion and under what circumstances. If the person perpetrating the lie refuses to discuss such matters in a frank manner, then the immediate official body shall conduct immediate "trial proceedings," offering the person a second chance to make disclosure of the influences causing him or her to perpetrate such a lie. If the person in question refuses to make disclosure, that person shall be immediately suspended from membership, and the case shall be immediately referred to both the NEC and to security headquarters in New York City.

These are stringent procedures but under the known circumstances of the present period, such stringent procedures are necessary at this particular phase of developments.

Furthermore, we shall require that any business or equivalent entity whose employee or other active associate circulates such lying representations on those premises or in any other manner which might be reasonably construed as the activities of that entity shall be summarily disciplined by the management of that entity, or otherwise shall risk immediate appropriate action by the ICLC according to the cause for offense given.

This 'nagging" disease of putative "sympathizers" of Kostas K. will be stamped out as of this date. True, p[illegible]ns have a right to honest differences of opinion; they do not have the right to knowingly spread malicious and damaging falsehoods. Since the conditions have been more than fully established that any person of the indicated categories repeating the indicated falsehoods is knowingly lying maliciously, there is not the slightest color of injustice in the simple, clean source of hygenic action prescribed.

(24)

Additional Facts To Be Made Known

As Uwe H. restated his own information on this matter during a recent NEC meeting, Kostas K. had been engaged in constructing a network within the organization, as an integral part of his wrecking-operation.

There are two general phases to this problem. One phase covers the period from Kostas' return from Germany, up to the beginning of his overt treachery. The second phase, of more immediate practical concern, dates from no longer than the summer of 1978, and it is strongly indicated that it dates from as early as October or November 1977.

Throughout the earlier period, Kostas had to be caught up short for his lapse into the KGB organizational methods (in which he had been trained earlier). The hideous ego-stripping orgy conducted at the 1973 local meeting at New York University was only the discovered expression of the evil practices of "psychological conditioning" in which Kostas and others had been engaged during the "Mop Up" security period. The OTS school was another case of Kostas' resort to KGB methods of attempted "Korean brainwashing." The Chairman and NEC on these and other occasions sharply corrected such abuses and Kostas whenever this sort of evil practice was discovered.

Admittedly, serious injury was done to the organization by Kostas's use of such methods, and his efforts to induce similar practices by others. This is one of the reasons the EEC has always tended to function better as a deliberative body than the NEC. The poisonous effects of Kostas' KGB organizational methods, too often echoed by others, promoted precisely the sort of heteronomic ferment *such methods are designed to effect* when used by the KGB proper.

It well known that for reasons not yet precisely determined, but probably bearing on the early 1974 Lower Saxony campaign and the confrontation with the Club of Rome at Bucharest later that year, that the Venetians and their underlings have a special hatred against Helga. The case of Venetian terrorist-linked Tony Rissotti is an early example of this. It usually makes no sense in the immediate cases this is encountered, except from the standpoint of *the barking of the master's dog*.

It is consistent with that that every phase of Kostas' known willful efforts to wreck the organization since the summer of 1978 coincided and often even pivoted upon a campaign of filthy rumors, and otherwise immoral degenerate's attacks against Helga. For example, those persons deemed insufficiently "cold" to Helga on the security staff were systematically victimized on orders from Kostas. This degenerate wretch's venom against Helga was merely the leading-edge of a corresponding malicious falsehood-spreading against the European organization generally.

What came out into the open when Kostas was confronted by the Chairman in the midst of Kostas' efforts to wreck the European organization completely, early last October, had been conducted through duplicity over a period of more than a year preceding. This has now come out into the open through a security meeting at which members of the staff compared experiences face to f[illegible] Kostas had given cause for summary expulsion by the time the 1980 election-campaign began. His removal from the NEC would have been moved immediately by the Chairman back during the Spring of 1974 if the whole truth about the OTS operations had been fully disclosed by members of the security staff ordered to conduct a KGB-style brainwashing operation against the NEC and others at OTS.

Over the course of the period of his conscious treachery, Kostas concentrated on attempting to destroy certain persons, or at least to isolate and discredit them with aid of lies, while at the same time constructing a network, *predominantly of women*, in the legal, financial, and entities' staffs in New York City. This was supplemented by a special operation of manipulative lying and related measures against the Detroit region.

This attempt to build a "KGB-network apparat" of women is an aspect of the process reflecting an infantile-oedipal side of this personality, the same flaw which triggered paranoid-schizophrenic mental degeneration under the increasing stress which Kostas' treachery inflicted upon him. It has been subsequently determined that Costas' degree of apparent illness last early summer was highly exaggerated. The most alarming sympton was not found to have any supporting basis in illness, and was reported to have been voluntary—e.g., psycho-somatic. Moreover, his degree of activity from his convalescence, including rage-filled orders to endanger the Chairman's life and his curring the newspaper mailings (and then blaming this on Uwe H. afterwards), typify the evil scheming with which he was actually occupied, and at a considerable level of activity considering the reports put out concerning his reduced condition.

Some persons in the networks Kostas was building in legal, security, finance, entities' management, and in a scattered way around the field, became witting "moles" in more or less witting service of the same agencies controlling the NAG group around Eric Lerner controlled by the D.K. Ludwig interests, the *New York Times*, and Roy Cohen's clients. Others, unable to face the wall of psychological pain separating them from recognizing the form of "Korean-style" brainwashing to which they had been subjected, became foolish accomplices of the NAG operation, chiefly because they could not muster the moral strength to face the simple truth which confronted them.

Although the foregoing is merely a small fraction of the whole picture, it should prove helpful to members—especially those manipulated by Kostas' lies and related KGB organizational methods—in becoming self-conscious of the evil experience through which we have recently lived, and becoming self-conscious, getting on top of the problem, they will more readily free themselves from the psychological wounds inflicted by this evil combination of wrecking and KGB-network building.

The ultimate points of control of this problem the members already know. It is Tavistock, et al., including the circles of Noam Chomsky and Major Louis M. Bloomfield, who happen to be interlocked in this and other matters. It is the same crowd which ran the "Bavarian" operation during 1969-1970. It is the same crowd which deployed Michael Vale and which created the NAG group around Robert Dillon, Arthur Castle, Alice Weitzman, Lauren Goldner, and the operations involving the famous rental informer, Jose Torres of the well-known Puerto Rican terrorist Torreses. It is the nest of Fabian horrors based in the University of Chicago.

NCLC Internal Discussion Document

Paul Teitelbaum
February 1, 1981

(25)

Throughout the recent "discussion," making reference to those few courageous and dignified statements made by individuals unable to swallow the excrement dished out for them and greedily devoured by the overwhelming majority of the rest of the organization, the letter of resignation submitted by Eric Nelson deserves particular attention. The reason for this is that Eric correctly locates the most significant problem in a way which has not otherwise been explicitly stated.

Specifically, Eric does *not* address himself to LaRouche. The question he asks is whether the NEC, and, by extension, the membership at large, you, would "find the courage to deal with the LaRouche problem." That's the right question.

Let's state some facts. Most of us joined the organization for good reasons. Long before we enshrined the word "reason" as a jargon term with a capital "R", we understood the purpose of the organization as being the means to allow for the existence of a human race which would deliberately and deliberatively determine its own destiny based on the scientific understanding of its own self interest. And that this conception included the highest notions of art, integrity, and intellectual achievement of which men and women are capable. And most of us put our money where our mouth is. For the last six years, eight years, ten years, and so on.

During the course of putting our money where our mouth is, some of us learned that the test of adulthood, the test of personal strength, is the ability to deal with the painful truth, the ability to find that part of you which forces you to do what you should do, as opposed to what you want to do. We've frequently heard, and spoken, the word "ruthlessness." Right now, Lyn is not playing with a full deck. It's really very obvious. Can you face it?

Back when this thing started, how many of you heard David Goldman accuse Gus of being an embezzler during a National Office briefing? Two weeks or so later, how many of you heard Lyn say that, not only was it untrue that Gus was an embezzler, but furthermore, Goldman *could not have said it*, and anyone who claimed that the statement had been made was a liar! When Mary said that she was there when Goldman made that particular statement and had confidence in the ability of her ears to hear and her mind to remember, Lyn switched gears, changed the subject, and told us that money diverted into Computron was not really the issue, that Gus had single-handedly destroyed the entire national organization, that Andy could own five percent of a computer selling for $14,000 and make $7,000 per unit, that Lyn invented the software business in general and on-line validation in particular, and much more. How many times did the same thing happen during the course of this one meeting? Do you think that Goldman developed the "embezzler" formulation himself? Where the hell do you think he got it?

Then there's the famous one and one half million Jews. Read the goddamned article. New Solidarity, August 22, 1978; I'll be glad to furnish copies. There's nothing in there about Schacht or Speer or the useless eaters policy versus another policy. It simply, baldly, states that the Nazis only killed one and a half million Jews. Furthermore, you, as a loyal member, are *ordered* to consider me, and treat me, as a conscious agent of Roy Cohn merely for pointing this out. Doesn't that bother you? It's not such a big deal for a person to retract an irresponsible statement. Consider the enormity of Lyn being unable to do even to do even this.

This past week saw the issuance of Andy's and Lyn's joint statement. Lyn tells us that we are not to apply any type of perjorative interpretation into his statements. Isn't that a little too much? But I've actually seen people say to my face that "thief doesn't really mean thief, liar really doesn't mean liar." Nor are the phrases "immoral chiseller" and "fast talking two-bit salesman" perjorative. How can any of you repeat this sort of double talk without feeling very sick?

And there's so much more. As you well know. When has the enemy ever been handed so many weapons to use against us as he has through Lyn's memos over the last two months? Massive divergence of funds from the campaign into a private business? Among other things. Isn't that just a little more illegal than any number of scandals that have destroyed political careers and movements in recent memory? If it were true, and it's not, how much would the enemy pay to be able to prove it? Lyn has been telling us for years about how much money the enemy has invested to that end. Now he seems to be determined to provide them with a return on their investment. This is sheer insanity.

I've talked to several people who've said that the question of particular facts and so on and so forth is not the question. The question, they say, must be posed politically. If there was a consistent pattern of mismanagement and bad decisions which reflected a systematic flaw in the thinking of the decision makers, then this must be rooted out.

Well, that's fine. I believe that serious mistakes have been made and that mismanagement has occurred. But the above cited people are wrong. The lies *are* the point. The character assassinations *are* the point. And most importantly, your hysterical refusal to see what the evidence adds up to is the point. How will you act if someone puts a gun to your head and demands that you join the pogrom? Do you think that you will have integrity when you can't find your courage now? You laugh at Nick's description of the Greek peasant with the high IQ. Will *you* behave like the peasant's peasant father who was not a member of any humanist organization but took a gun and fled to the mountains? Will *you* act like the woman who ran dynamite to the resistance, or will *you* act like the man who accuses that same woman of being an agent of the KGB while he rewrites his autobiography to hide the fact that he was in a Conscientious Objector Camp while she was fighting the Nazis?

Look at your leaders. What a disgusting spectacle. Nick. Disgusting. Nancy, not surprising to me, but still disgusting. Uwe, watching Bruno burn while he kisses the pope's ring - if we compare Gus' mother with Galileo on a moral scale, where do we put Uwe? One must point out that Galileo, at least, was in peril of his life. Paul Goldstein, Jeff and Michele Steinberg, people who maintain their silence while Gus is accused of stripping Lyn's security and failing to counterpunch against Roy Cohn, what a bunch of swine. And the rest. At the same time, since we are all entitled to play by the same rules, let me take the opportunity to assure you that the above statements are for informational purposes only and are not to be misinterpreted as being perjorative against individuals.

Last Saturday, someone who should know better told me that he knew Gus was insane because Gus made a statement to the effect that the organization was, at this moment, fascist. He went on to say that Gus was not, in fact, insane at the point that Lyn insistently and repeatedly denounced Gus as such to the membership, and that it was Lyn's very activity which drove Gus insane! The astonishing conclusion which he reached from this is that, when considering Gus, a particular statement reported to him by a third party was sufficient for him to conclude that Gus had gone over the deep end. When considering

Lyn, who has just been charged with falsely accusing his closest collaborator of ten years of insanity and thereby causing this to occur, one discards all such vulgar predicates. One defends Lyn's most recent statements with no reference to the way in which these statements contradict Lyn's previous statements. One's duty is to ignore all of the evidence which points to Lyn's unbalanced state of mind, despite the fact that many, many people know that the evidence I've alluded to is merely the tip of the iceberg.

One last comment. Some time ago, Lyn returned from an extended stay in Europe and gave a public presentation in New York. Some of our German members were present. At the end of the speech, the claque initiated the chant of "Lah' Rouche, Lah' Rouche, Lah' Rouche, Lah' Rouche..." My reaction at this and all subsequent occasions is difficult to describe. Suffice it to say that one's hair really does stand up on one's neck. We're all guilty of a disservice to the human race, and to Lyn in particular, for playing "hear no evil, see no evil, speak no evil" with this. We all bear responsibility for Lyn's slide into megalomania.

In summation: I demand that Lyndon LaRouche be suspended from all policy and decision making functions in the organization, for his own good and for the good of the human race. I demand that our otherwise gifted people find the vertebrae that they have misplaced. I realize too well that the likely fate of this document is to be confiscated by our zealous Security officers while the few copies that slip through provoke some contemptuous giggling in the National Office, as was the fate of the eloquent statement written by Gus. If you act in this fashion, if you betray this trust, then the characterization of the organization as fascist will become irrevocable, with all that you know that this implies.

Postscript - February 11, 1981

After having decided to postpone publication of this document, today's Internal Memo calling for the institution of the New Inquisition has made the question of whether or not I choose to resign a moot point. It should be obvious that this hysterical piece, which follows logically from the earlier pieces which variously insult and threaten the field organization, reflects Lyn's realization that many members are not swallowing these enormities but are instead silently and sullenly going through their day to day motions.

Three evenings ago I had a discussion with a long-time friend and colleague of mine who, like many of you, has kept his mouth shut during the current period. This person told me, as I had so often in the past told myself, that the briefing and Lyn's contributions in particular are often looney, and that it is necessary to tune out the discordant notes in order to appreciate the harmony of the music. This same person had attended a public briefing given by the NEC the night before during which Uwe Friesecke had told us the one about "What's the difference between Kostas and Judas? – Judas didn't spend the money." When asked how he felt about this the fellow admitted that "it turned my stomach." So why didn't he say anything? Why didn't he protest? Well, "the aversive climate in the organization makes it impossible for me to speak up." Untrue, of course. I and others have not found it "impossible" to repeatedly publicly and privately confront Lyn on his lies. What this person really meant to say is, "the aversive climate in the organization makes it impossible for me to speak up without sacrificing the warm feelings and sentimental regards of the frothing dogs and cringing jackals who presently comprise the leadership of the ICLC." When asked what he thought might happen if a hundred people like him suddenly found the courage to speak up, he replied that this would destroy the organization! Isn't that unbelievable? The organization can only survive based on a conspiracy to maintain immoral silence by all members who have even a moderate sense of decency? And by default, to leave everything we have fought for in the hands of the variously wild-eyed, wide-eyed, and shifty-eyed people who have committed themselves to the cult of LaRouche's infallibility? For those of you whose "stomachs turn," you'd better realize that a massive public outpouring of protests and/or resignations is the last chance that you'll have to even try to deliver a shock to bring the organization to its senses.

I hereby formally resign my membership in the National Caucus of Labor Committees and disassociate myself from all organizations under the control or influence of Lyndon LaRouche.

Open Letter to the NCLC [redacted]bership

(27)

February 14, 1981

I am writing this letter to the NCLC membership in response to the actions of my friends, some of whom have resigned, some who have resolved to go through fire and water with LaRouche, and some who have resigned themselves to remain with the LC, at least until the next affront to their consciences.

The flurry of memos from LaRouche since mid-December, the subsequent letters of resignation and the consequent "security" memoranda issued in reply to the resignations, have raised questions somewhat larger than the specific charges and slanders raised at various members.

Theoretically, the cadre participates in the selection of the organization's leadership - i.e., those political and administrative executives who are, hopefully, most qualified to initiate and develop the new strategies required as the organization achieves - or fails to achieve - its goals. In practical terms, the selection of leadership necessarily involves trust. It is not *faith* (the belief in someone or something irrespective of or despite knowledge) but *trust* - rational belief based *in* knowledge - which is the basis of the cadre's implicit or explicit mandate to political and intellectual leadership.

Developments following the elaboration of the "elites" organizing perspective have placed a heavy burden on the membership's trust in its leadership, and necessarily so: the membership is often necessarily distanced from certain negotiations and decisions made on its behalf.

It is in this context that the membership should review the present situation. Whether or not initiated by LaRouche, and whether or not known to LaRouche, primitive accumulation against the membership and infrastructure was carried out over a protracted period. Members most directly affected worked in intolerable conditions, and continued to do so because of the political and "objective" portrayal of the situation.

One would expect of a responsible leader a careful evaluation of the scope and details of the situation once learned of, and the written dissemination of only that information sufficient to "get back on the track." Instead, LaRouche, upon learning of the economic holocaust ostensibly for the first time, launched a cynical campaign to "blow the scandal," placing the organization and a significant number of members in political and legal jeopardy. The sheer amount of crap placed in writing - including the "moral opinion of the majority" posturing - reflects a complete abandonment of prudence, and a de facto breach of trust as Chairman.

Further, L[redacted]uche pursued a policy of capricious brinksmanship against certain leaders in the entities, further lowering productivity and making even more precarious the survival of the entire collection of entities. (Has the membership considered the practical repurcussions of a failure of one of these entities? We can only assume that Mr. LaRouche knew of these practical considerations, which makes the "politics" of his tactics untenable).

To what end was all this grandstanding aimed? First, LaRouche had to force Andy and Gus to *reply* to his charges, since the membership would - on the whole - agree with LaRouche's charges with few reservations once either or both rose to "defend themselves against Lyn." LaRouche may also have been counting on their reluctance to defend themselves with facts which would damage both the Chairman and the entire organization: this would be the mark of someone who has placed himself "beyond." The fact that hysteria-induced attacks on Gus escalated to the point of practically threatening his life, and that then and only then did Gus say anything publicly, should give the membership some food for thought in an otherwise-starved period.

The second, and ultimate aim of the campaign involved playing down the NEC as helpless - given Gus and the circumstances - and thus to remind us all that, lest we forget, there is not only one Lyn, but only one truly competent leader—period. By giving the NEC an 'out' for the recent past, and by announcing "trials and purges" of anyone who doubts that Gus poisoned Alexander the Great, LaRouche has one-upped George Orwell in showing how to close ranks at the top to carry on as usual.

Each member must examine the current political situation, the present political direction of the organization, the "ecumenical" nature of certain Sunbelt ventures formed recently, and the psychological climate emerging in the organization.

The handling of "security" is an efficient "crucial experiment" in assessing LaRouche's motives. If the current "scandal"-based hysteria is later used to discourage political and strategic discussion within the membership, how will proper intelligence (for example) ever be gathered, let alone acted on?

If the membership has lost the right to question or recall an executive, on what *basis* does the organization operate? What kind of humanism can be cited to support the present situation (no Borgias need apply)?

If the criteria for continued membership ceases to be trust (and how can the knowledge required for trust be obtained without free discussion?) and becomes *fealty*, what will emerge that is distinguishable from Scientology or the Sicilian family business?

D. Phillips
(signed)

WORLD'S LARGEST EASTER EGG HUNT
Saturday, April 18, 10 am-12 noon — Central Park, 72nd St. & 5th Ave.
Sponsored by The Epilepsy Institute — FREE — All children welcome
Pre-register at Gimbels by April 11 & 17, 2 pm to 7 pm, 12 noon to 4 pm

NEW YORK'S
OUR TOWN

MANHATTAN'S NUMBER ONE COMMUNITY NEWSPAPER • WE CARE ABOUT YOU
VOL. 11 • NO. 49 APRIL 12, 1981 thru APRIL 18, 1981

Inside:

Jews quit LaRouche cult . . . . . p. 3
Nursing home fined $7,000 . . . . . p. 3
Bd. 8 Subcommittee rates Ruppert proposals . . . . . p. 4
Summer camps . . . . . p. 13
New home for Asia House . . . . . p. 16
Our Town entertainment . . . . . starts on p. 8
Community Happenings . . . . . p. 19



Clean up E. 53rd St. prostitutes

Charges against bar

By ROBBI PEELE

An investigation of male prostitution in the East 53rd Street area has led to a number of arrests and may lead to the closure of establishments catering to prostitutes and their clientele.

The 17th Precinct, the Public Morals Division of the New York City Police Department and undercover officers from the Public Morals Division also patrol the area a minimum of twice a week.

Approximately 70 males have been arrested for prostitution on 53rd Street and 54th Street between Second and Third

Jews quit LaRouche cult

Anti-Semitic 'ashtray joke' and denial of Holocaust cited

By DENNIS KING

After years of blind loyalty to the anti-Semitic politics of the National Caucus of Labor Committees (NCLC), Jewish cult-followers of NCLC chairman Lyndon LaRouche are beginning to see the light.

Recent discussion documents and letters of resignation by several Jewish members (Jews comprise about 20 percent of the organization) reveal a deep anger over LaRouche's bigotry and his authoritarian methods of leadership.

The authors of these documents have not yet broken fully with the LaRouche world view. They continue to call themselves "humanists" (in the LaRouchian sense), and they still regard the outside world as "the enemy."

Nevertheless, their documents are a strong critique of the tactics and goals of LaRouche, who launched NCLC as a far-left organization in 1967 and gradually led it to the opposite end of the political spectrum, where it linked up with traditional anti-Semitic, neo-Nazi and Klan fanatics.

The current unrest inside NCLC has its origins in a dispute over money between LaRouche and two of his top aides, Konstandinos Kalimtgis and Andreas Typaldos.

As described in last week's Our Town, Kalimtgis and Typaldos wanted to use NCLC funds to prop up an ailing party business front, Computron Technologies Corporation, of which Typaldos was the president, Kalimtgis the "founder," and Kalimtgis' wife the office manager.

LaRouche disagreed with the salvage scheme, and several clashes took place, resulting in the suspension of Kalimtgis from his longtime post as NCLC chief of staff.

Informed sources say that about 20 Jewish and non-Jewish NCLC members came forward to support Kalimtgis and Typaldos after LaRouche produced a series of memos accusing the Greeks of financial dishonesty and ideological laxness.

The anti-Semitism issue surfaced in mid-January when NCLC put out a news release, "LaRouche Reaffirms '1.5 Millions' Analysis," which underscored and refined a previous well-known LaRouche statement that only 1.5 million Jews had been killed by the Nazis in World War Two. The earlier statement had been contained in an NCLC article similar to the propaganda of the Liberty Lobby, a far-right organization led by LaRouche ally Willis Carto. (The Liberty Lobby believes the Holocaust is a "myth" concocted by Zionists to gain world sympathy.)

LaRouche's latest version of the 1.5 million thesis was relatively mild compared to many of his previous statements on the Jewish question, but it came at a critical moment for members of the pro-Kalimtgis faction and apparently was the

continued on page 14

DeWitt fined $7,000

BY DARCY FEINGOLD

At an administrative hearing of the New York State Dept. of Health on Apr. 1, the DeWitt Nursing Home, located on East 79th Street between Second and Third Avenues, agreed to pay a $7,000 fine for its violations of the Public Health Law and the State Hospital Code. In return, the State has granted the Home a provider allowing it to operate for another year.

Both conditions are provisions of an agreement between the State and DeWitt in response to the Statement of Charges and Notice of Hearing that was issued to Dr. A. Lee Lichtman, the Home's owner, operator and administrator, early this year

Health Dept., there are no laws governing constant Code violators. Health Dept. attorney Shearer corroborated this fact and added, "For instance, in this case under the law we had to limit our investigation to only the 53."

In the case of DeWitt, several of the 53 violations are not new situations. In a survey done in October, 1979, several instances of poor drug administration were found as well as inadequate storage of food and occasional patient neglect. At that time, plans of correction were made by Lichtman for all deficiencies and declared acceptable pending investigation. *One year and two months later, some of these conditions were*

1-0407

SY RIDE
17.00
11.00
23.00
13.00
MODEL
DANS
nomy Rates
LOCALS • TO AND
CUSINESS TRIPS
8-2004

le ?
Student
enter
it at
TER

RCONDITIONED
CVILLE
MARKET
SATURDAY
M-5 PM
st 74th St.
ervations
ation Call
5235

Relief Services'
on WPIX-TV
PM to 2 AM.
ict June Carter
additional in-

LAROUCHE *continued from page 3*

final straw for some.

Two of the dissidents, Donald and Alice Roth, immediately dashed off a letter announcing their resignation from NCLC:

"The memos of Lyndon H. LaRouche," they wrote, "are a hideous, moral abomination . . . It was bad enough that LaRouche should echo the words of a known Nazi sympathizer, Willis Carto, cynically dismissing the true horror of the Nazi holocaust with the argument that 'only' one and a half million Jews died. Much, much worse is the fact that LaRouche was too small a person to admit his mistake and retract that damaging statement, but instead sought to wallow in its reaffirmation. That reaffirmation was the sign of a mind which has become dangerously ill . . . "

The Roths followed up with a more detailed letter analyzing the relationship between bigotry and brainwashing in NCLC. The letter cited, as a prime case, how NCLC members are "subjected to sick 'Jewish' and other 'ethnic jokes'." (Example given: "How many Jews can you fit into a Volkswagen?" "One hundred. Four on the seats and ninety-six in the ashtray.")

According to the Roths, LaRouche's use of such jokes "has been an important tool for psychological manipulation of the membership." The jokes, the Roths charged, help to generate self-hate among Jewish party members, as part of a process by which members are psychologically "bludgeoned" into rejecting their parents and their previous values.

The entire process had resulted in a "moral anaesthetization," the Roths recalled, so that NCLC members became "capable of taking political actions which violated their most basic sense of morality."

The resignation of the Roths from NCLC was followed by that of Computron executive Paul Teitelbaum (among others). Ten days before resigning, Teitelbaum wrote an "NCLC Internal Discussion Document" which gives a vivid picture of the totalitarian atmosphere inside the party.

"Some time ago," Teitelbaum recalled, "(LaRouche) returned from an extended stay in Europe and gave a public presentation in New York. Some of our German members were present. At the end of the speech, the claque initiated the chant of 'Lah'Rouche, Lah'Rouche, Lah'Rouche, Lah'Rouche . . . ' My reaction at this and all subsequent occasions is difficult to describe. Suffice it to say that one's hair really does stand up on one's neck . . . "

Teitelbaum concluded with a demand that LaRouche "be suspended from all policy and decision making functions in the organization, for his own good and for the good of the human race." If the NCLC membership should fail to implement this demand, Teitelbaum said, "then the characterization of the organization as fascist will become irrevocable, with all that you know that this implies."

The forthright statements of the above and other dissidents contrasted sharply with the vacillating tactics of the nominal leaders of the dissidents, Kalimtgis and Typaldos.

Sources close to Computron say the two Greeks urged their supporters not to go public against LaRouche, because it might upset attempts at a reconciliation and also jeopardize the Chapter 11 reorganization of Computron.

In addition, NCLC documents show clearly that Kalimtgis and Typaldos have not really broken with NCLC's political program, and are willing to repudiate their own [illegible] placate LaRouche.

For instance, Kalimtgis said in a letter to LaRouche (Jan. 26): "I wish to reassure you and others that I would never degrade myself by allowing myself to become the instrument of enemy efforts to demoralize or destroy the membership of the organization which I spent so many years in building."

Kalimtgis then praised the NCLC chairman's alleged theoretical achievements, saying: "These accomplishments are not subject to opinion or to rejection on my part due to ephemeral disagreements on other matters. If, therefore, others, be they misguided individuals or agents, choose to 'rally around' my person, I hope that you will spare me the humiliation of ascribing to me the responsibility for such an occurrence."

Computron chief Typaldos was even more conciliatory to LaRouche, in spite of the abuse LaRouche had heaped upon him. In late January, Typaldos and LaRouche both signed a "Memorandum of Agreement" which stated that Typaldos "deplores the use of misguided defenses of his character and his actions to fashion attacks against the organization [NCLC] that he supports and continues to belong to."

Informed sources say that, two months later, Kalimtgis and Typaldos continue to avoid attacking LaRouche. And the other dissidents continue to honor the wishes of the two Greeks by not going public (outside NCLC circles) with their important revelations about the inner life of the LaRouche cult. □

EAST 53RD ST. *continued from page 1*

for prostitution on the premises of an establishment have been made, the Public Morals Division can then bring civil action against the establishment.

In the first part of February, two arrests were made in Cowboys and Cowgirls, a bar at 244 E. 53rd St. The bar was then closed for several days, and after alterations, reopened under a new name, The East Five Three. The bar is still catering to male prostitutes, Officer McGregor said.

Civil action charges against Cowboys and Cowgirls will be heard in court in two weeks. If the judge finds sufficient evidence, he then can decide to close the establishment or to let it remain open under restrictions. In addition, if illegal action is proven, the New York State Liquor Authority can revoke the liquor license. Dallas, a bar across the street from The East Five Three, is also under investigation.

"The area has been cleaned up," said McGregor, "but (prostitutes) just move to other areas." When the extra police officers are removed, they will come back, he added.

Arrest is not a deterrent because of the inefficiency of the criminal justice system, according to Sgt. Shields. A 13 year old male prostitute he arrested was released without bail and went to Massachusetts before his trial took place, Shields said.

"Although the conviction rate is extremely high for prostitution," Shields explained, "the court lets them go. They plead guilty and get a sentence of time served. They're out there the next night."

But the ultimate responsibility belongs to the public, he said. "If we could do away with (prostitution), we would," Shields continued. "We have put a dent in it, but we haven't controlled it to the extent we want. Lots of people want the services of male prostitutes."

OUR TOWN

NEW YORK'S

MANHATTAN'S NUMBER ONE COMMUNITY NEWSPAPER • WE CARE ABOUT YOU

VOL. 11 • NO. 48

APRIL 5, 1981 thru APRIL 11, 1981

Supplement starts on page 6



Summer Camps & Schools

The 92nd Street Y offers summer fun for all ages.

Public speaks on Ruppert plans

Concerns are various; Bd. 8 eliminates one of four plans for elderly

By PAUL KELLOGG

Last Thursday night, at a public hearing held at P.S. 198 concerning the development of the largest remaining site of the Ruppert Urban Renewal Area, a profusion of speakers from various community groups propounded their ideas regarding the future of the site.

Community Board 8, which called the hearing to determine general community feeling, is presently reviewing plans recently submitted by private developers through HPD (the City's Department of Housing Preservation and Development).

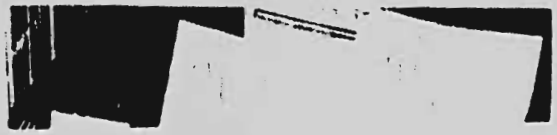
These plans include eight proposals for housing on site 4B, [illegible]

of site 4B; and the NY City Foundation for Senior Citizens, whose proposal for site 4C would use the same contractor (Tishman Construction Corp.) and architect (Davis Brody & Assoc.) as the C.I. Mortgage proposal for site 4B.

By far the most clear-cut public relations campaign of the evening was waged by C.I. Mortgage and Tishman Realty and Construction. A number of speakers pushed the plan par-

continued on page 5

Postal site battles go on



By ROGER W. GILROY

Alleging collusion and misuse of federal funds, about a hundred demonstrators last Thursday called for an investigation into the impending sale of the Murray Hill Post [illegible]



Site tenants and community residents picketed the Murray Hill Post Office asking that the sale of the square-block site be halted.
Photo by PUCCI LARUCCI

Congressman Bill Green, calling on the Acting Comptroller General of the United States to investigate the sale, members of the Murray Hill Post Office Site Tenants Association urged that the sale be held up pending an investigation.

The site, bounded by Lexington and Third Avenues and 31st and 32 nd Streets, has been an arena in which the various forces and influences affecting land use in New York City have jousted since 1963 to achieve their respective goals. A winner may finally be emerging from the 18 year old struggle.

On Feb. 23, the United States Postal Service accepted a bid on the property of $17,111,000 from the Mastic Development Corporation.

The Postal Service had acquired title to the block in 1963 through eminent domain. Its intention was to build a larger facility on the site. The program was never carried out. This was due, at first, to political intervention on behalf of the tenants by then Congressman Ed Koch and others. Eligible tenants were eventually covered by the Uniform Relocation and Assistance Real Property Act of 1970. The Postal Service

continued on page 12



ng from the Long Island City city streets to Madison Square run from Apr. 1 through May
Photo by AL LAPRESTO

Bankruptcy petition is filed by Computron

Software firm's problems spark political extremist infighting

By DENNIS KING

Computron Technologies Corporation, a multimillion dollar computer software firm linked for many years to the ultrarightist National Caucus of Labor Committees (NCLC), has filed for reorganization under the Chapter 11 provisions of the Bankruptcy Act.

In a debtor's petition filed on March 3 in the United States District Court for the Southern District of New York, Computron lists assets of $2,139,000 and liabilities of $2,955,000. The petition seeks protection from creditors while the Manhattan-based corporation, which also operates in Europe and the Persian Gulf, reorganizes its affairs under court supervision.

Computron rose to prominence among New York systems houses in the late 1970s as a result of its cooperation with Wang Laboratories, a rapidly expanding computer hardware firm which does high security work for the U.S. intelligence community, the State Department and leading defense contractors.

continued on page 12

es and prayers for a rapid recovery
cretary James Brady, Police Officer
Agent Tim McCarthy.

'Shocked!'
Yorkville reacts to assassination attempt—page 3

COMPUTRON *continued from page 1*

Thanks in part to referrals from Wang, Computron developed a software vendor business with revenues of over $5 million per year. As of last fall, Computron claimed installation of over 200 systems for a list of clients which included Mobil Oil, AT&T, Colgate Palmolive, and the Institute of International Education.

The link between Computron and the NCLC was first uncovered by Our Town in a Sept. 9, 1979 article. The following month, the New York Times noted the connection in a frontpage expose of NCLC. Both articles reported allegations by NCLC defectors that Computron revenues had been channelled into the party's political activities.

Since then, defectors have released a report on NCLC finances estimating that 20 percent of the party's annual budget (as of 1979) came from its "business ventures, principally Computron," and that the total amount skimmed from Computron was "certainly in excess of $750,000." The report quotes a party leader as saying the amount ranged from $5,000 to $10,000 per week.

"These funds were directly paid from the Computron accounts into the (NCLC) accounts, with money being recorded as wage payments in Computron tax records," the report says.

Computron has officially denied any skimming, but the firm's Chapter 11 petition is rather vague about the current financial crisis, merely stating that "the debtor incurred substantial operating losses...as a result of expansion and diversification which proved to be nonprofitable as well as an undue burden on its operating budget."

hundreds of thousands of dollars allegedly had been diverted from NCLC into Computron, to prop up the ailing firm. In addition, the memos attacked Typaldos as a baleful ideological influence on Kalimtgis.

Our sources say the two Greeks "hunkered down," hoping the Chairman would relent. But LaRouche's action had sent shock waves through the organization, and friends of Kalimtgis and Typaldos began to raise questions.

LaRouche responded by sharpening his attack, accusing Kalimtgis of "willful deceit" and of having his "hand in the till."

The suspended chief of staff could no longer remain silent. In an "Open Letter" to LaRouche, dated Jan. 26, he denied the charges and claimed that, far from using NCLC funds to subsidize party-linked businesses, he had actually attempted to do the opposite:

"You lie," he told LaRouche, "when you charge that I chased business ventures and used the organization to that end when you possess all necessary knowledge of how I repeatedly tried to sell off future business assets and business ventures to meet our immediate political and security needs."

Kalimtgis declined, however, to "make a public presentation of material that could irrefutably clear me of all your malicious charges, but would ultimately be used to bring harm to many members and to the organization" (he also referred to LaRouche's own possible "legal jeopardy").

Nevertheless, Kalimtgis left open the option of going public at a later date: "Unlike you, Lyn, I do not say to myself that 'even if I were put before ten grand juries I would tell them that I knew nothing...' You have rejected every appropriate forum within which I could have presented every sensitive payments and accruals in excess of payments. Contrary to Costas' and Andy's lying, at no point was there a net position accrued in favor of Computron in the balance of such flows."

LaRouche went on, in the Jan. 20 memo, to describe the payments as "interest-free banking for Computron by the organization and its vendors."

Careful reading of the documents of the LaRouche/Kalimtgis dispute reveals that both factions are in tacit agreement that a large cash flow took place both ways over an extended period between NCLC and Computron. The difference between the factions is over who benefited the *most* from this two-way flow during the past year.

In a sense, it doesn't matter which side is telling the truth, since either way the results may be devastating to both.

If LaRouche's version is true, then Computron must explain in Bankruptcy Court why the so-called interest-free bankers (NCLC and its vendors) were not listed among Computron's creditors in the March 3 debtor's petition, and why the alleged massive loans were not listed among the firm's liabilities. In addition, LaRouche himself may have to answer to the Federal Election Commission (FEC) about possible diversion of his Presidential campaign funds (see above).

If Kalimtgis' version is true, then both Computron and LaRouche may face a FEC investigation into the possibility of illegal and unreported corporate donations to LaRouche's campaign.

POSTAL SITE *continued from page 1*

was then responsible for finding suitable, comparable housing for many on site residents.

Our Town has obtained a detailed picture of Computron's crisis via confidential NCLC internal documents and interviews with former NCLC members.

According to the documents, Computron suffered heavy sales losses in late 1979 and early 1980 as a result of the Our Town and New York Times articles. This problem was aggravated, the documents say, by an attempt of Computron president Andy Typaldos, backed by NCLC chief of staff Costas Kalimtgis, to expand into nonsoftware products and overseas ventures without obtaining adequate financial backing.

When the cash-flow crunch came, Kalimtgis and Typaldos argued within the party for an all-out effort to save Computron. (The two had founded the firm in 1973, and over the years had added to their staff dozens of highly educated NCLC members who were willing to work for wages substantially below industry standards.)

NCLC chairman Lyndon H. LaRouche, Jr. was not enthusiastic about the proposed salvage operation. In his eyes, NCLC's financial situation in 1980 was quite different from that in 1978 (when, he recalled ironically, Typaldos had "returned with a bag of gold from the Persian Gulf.") In the intervening period, NCLC had strengthened its other businesses and fundraising operations to where party income was now well in excess of $100,000 per week. In other words, LaRouche no longer needed Computron--at least, not enough to justify diverting major resources away from NCLC's political mission.

Several clashes took place between LaRouche and Kalimtgis over Computron and related issues during the fall of 1980. Finally, on Dec. 15, LaRouche issued a memorandum suspending Kalimtgis, who had been his closest political associate for ten years, from executive duties in the party.

In subsequent memos, LaRouche explained his action by saying that Kalimtgis had instigated a party policy via which

...nothing... You have rejected every appropriate forum within which I could have presented every sensitive fact."

Kalimtgis was not the only NCLC member to see that LaRouche had opened a can of worms. In a Feb. 1 "NCLC Internal Discussion Document," a top officer of Computron complained:

"When has the enemy ever been handed so many weapons to use against us as he has through Lyn's memos over the last two months? Massive divergence of funds from the campaign [he means LaRouche's 1980 Presidential campaign--ed.] into a private business? Among other things. Isn't that just a little more illegal than any number of scandals that have destroyed political careers and movements in recent memory?"

The writer hastily added that no divergence of campaign funds had actually taken place. Yet previous statements by LaRouche had been quite explicit about "massive" payments from NCLC to Computron (if not from the official LaRouche campaign committee to Computron) during a period which overlapped with the campaign and with LaRouche's expenditure of over $500,000 in Federal matching funds.

"Over the past months," LaRouche wrote in a Jan. 12 memo, "Computron has survived because of massive financial assistance from the Labor Committees, both direct aid and massive infusions of credit. This amounts to hundreds of thousands of dollars of direct and indirect aid out of the pocket of the organization, and has been the only significant source, directly and indirect, of assistance to cover massive Computron losses..."

LaRouche then stated in a Jan. 20 memo that "The total payments from the organization and its vendors to Computron over a twelve-month period from November 1979 onward was just under $1 millions, most conservatively, of which at least a half-million was unjustified. This involves

...OSTAL SITE continued from page 1

was then responsible for finding suitable, comparable housing for many on site residents.

Finally, such factors as the increased use of mechanized equipment, the construction of a New York/New Jersey bulk mail center, the decline in the city's mail flow and the escalating cost of construction made the site unpractical. Last year the site was put on the market for sale.

The Mastic Development Corp. has until May 23 to close the sale. Last minute efforts by the Murray Hill Post Office Site Tenants Ass'n may yet bar the completion of the sale.

It is the contention of the Tenants Association that collusion and fraud were involved in the solicitation of bids and the award for sale by the US Postal Service. They claim that federal funds were misused at the expense of the taxpayer and that the sale involved considerable loss of money to the taxpayer. Both the developer and the Postal Service have denied any wrongdoing and have expressed a willingness to have the facts investigated.

At the Mar. 26 demonstration were tenants, employees of tenants, students and parents affiliated with two schools located on the site, and gardeners who have a community organic garden on the site. They marched in front of the existing post office at 142-154 E. 32nd St. They chanted "Stop The Sale," and held signs that read, "We Need A Park," "USPS Unfair To Taxpayers," "Investigate says Bill Green" and "Tenants Rights."

A representative of the Mastic Development Corp. indicated that the company planned to erect "as of right" residential and commercial buildings on the site, which would not require any exceptions from existing zoning regulations. □

PUBLIC NOTICE

TO ALL OCCUPANTS OF STORES, OFFICES, HOMES, APARTMENTS, BROWNSTONES

Effective immediately, the New York City Police Department will *not* respond to those they call the chronic alarm abusers. That means after three false alarms, the police will ignore any further alarms from your address . . . unless the problem is permanently solved.

In today's climate of crime, you *must* be protected. If you need an alarm system . . . if your present system is giving you trouble . . . if you think you're paying too much . . . call us today!

AMERICAN SECURITY SYSTEMS INC.
435 WEST 23 STREET
NEW YORK, NEW YORK 10011
212-691-4360



DESIGNER EYEWEAR
$24 COMPLETE*



At Haddan, we believe the price some people...

YOUR LOAN SOCIETY

THE PROVIDENT LOAN SOCIETY 1894 OF NEW YORK

THE PROVIDENT LOAN SOCIETY
of New York
Telephone: (212) 685-0380
PROVIDES
convenient & dignified facilities for borrowing money upon pledge of:—
DIAMOND & GOLD JEWELRY

GCC#4352
MUR 1158

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
2500 DETROIT BANK & TRUST BUILDING
DETROIT, MICHIGAN 48226

TELEPHONE (313) 963-6420
TWX-DETROIT 810-221-5007
TELECOPIER (313) 963-1382

ROBERT P. GRIFFIN
CLEVELAND THURBER
COUNSEL

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1939)
FERRIS D. STONE (1882-1946)

EMMETT E. EAGAN
WILLIAM G. BUTLER
JOHN A. GILRAY, JR., P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD B. GUSHEE, P.C.
PETER P. THURBER
LAWRENCE A. RING, P.C.
ROBERT E. HAMMELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C.
GEORGE E. PARKER III
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
ROBERT S. RETCHUM
SAMUEL J. McKIM III, P.C.
ROCQUE E. LIPFORD, P.C.
JOEL L. PIELL
ROBERT E. GILBERT
BRUCE D. BIRGBAUER
DAVID OLMSTEAD
GEORGE T. STEVENSON
JOHN A. THURBER

ORIN D. BRUSTAD
CARL H. von ENDE
GORDON A. BECKER
DAVID D. JOSWICK
CHARLES L. BURLEIGH, JR.
JOHN A. MARXER
GREGORY L. CURTNER
DENNIS R. NEIMAN
KENNETH E. KONOP
LEONARD D. GIVENS
W. MACK FAISON
MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS G. SCHROETER
THOMAS P. HUSTOLES
JOHN D. PIRICH
WILLIAM J. DANHOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
JAMES W. GOSS
JOSEPH A. SOBKOWSKI
THOMAS C. PHILLIPS
MICHAEL W. HARTMANN
KENT E. SHAFER
DENNIS K. LOY
FRANK L. ANDREWS

THOMAS W. LINN
RICHARD J. MARER
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
JOHN J. COLLINS, JR.
DONNA J. DONATI
DONALD W. REIM
LARRY J. SAYLOR
CHARLES E. SCHOLL
RICHARD J. SERYAK
MICHAEL R. ATKINS
MAUREEN P. AUGHTON
LELAND D. BARRINGER
EDW. D. ZINOWSKI
TIMOTHY D. SOCHOCKI
KRISTINE G. OPPERWALL
HUGH M. SMITH
MARJORY G. BASILE
BEVERLY HALL BURNS
TERRENCE M. CRAWFORD
MICHAEL E. DOWDLE
STEVEN M. GLOVSKY
STEPHEN R. GOOSTREY
SALLY S. HARWOOD

RYAN H. HAYWOOD
ALINE H. LOTTER
GEORGE G. MARTIN
CHARLES H. McCUEN
GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WEYHING
GRANT A. FREER
JOHN D. STOUT
AMANDA VAN DUSEN
BRIAN A. KASER
GARY A. BRUDER
RONALD J. CLAPHAM
DAVID F. DIXON
SALLY L. GEIB
DOUGLAS G. GEOGA
KAY I. JOHNSON
JENNA RUTH JOHNSTON
JOHN W. KRAUS
E. ELIZABETH PERLMAN
FREDERICK J. STICHNOTH
J. SCOTT TIMMER
JOAN BECKHAM WHITMORE
CONRAD L. MALLETT, JR.
JOHN D. RAVIS

BIRMINGHAM OFFICE
WABEER BUILDING
BIRMINGHAM, MICHIGAN 48012
(313) 645-5000

MONROE OFFICE
EXECUTIVE CENTRE
214 EAST ELM AVENUE
MONROE, MICHIGAN 48161
(313) 243-2000

TRAVERSE CITY OFFICE
13999 WEST BAY SHORE DRIVE
TRAVERSE CITY, MICHIGAN 49684
(616) 946-1000

LANSING OFFICE
110 BUSINESS & TRADE CENTER
200 WASHINGTON SQUARE NORTH
LANSING, MICHIGAN 48933
(517) 487-2070

Washington Office
1015-15th Street, N.W., Ste. 1240
Washington, D.C. 20005

James F. Schoener
Counsel
(202) 789-8690

March 27, 1981

Robert Bogin, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1158
MUR 1253
MUR 1236

Dear Mr. Bogin:

I wish to confirm our telephone conversation of March 23, 1981 in regard to the above-entitled matters. We anticipate that we will be able to give you a written memorandum on the three MUR's at the conference which we will have on Friday, March 27, at 11:00 in the morning.

The subpoenas which you intend to issue and to take at Portland, Oregon on the 27th of April are in the process of being confirmed. It is my understanding that there will be

six depositions taken and that you anticipate that we can take them all on the 27th and return to Washington on the 28th.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:mfb
cc: Ms. Barbara Boyd

[illegible]

GCO#4353

Citizens for LaRouche

Box 976, Radio City Station, New York, N.Y. 10019

March 26, 1981

Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Re: MUR 1158

Gentlemen:

On February 6, 1981, the Commisssion wrote a letter to Citizens for LaRouche notifying the Committee and Felice Gelman of a "reason to believe" finding in the above matter and annexing the General Counsel's factual and legal analysis. Through counsel, CFL sought an extension of time in which to respond to the notification, which was granted, and now responds to the Commission's finding.

The factual and legal analysis placed before the Commission by the General Counsel's office seriously misrepresents the facts of this matter and its history. The notification itself, in the context of the actual factual and legal history, raises serious legal questions. For the reasons set forth below, we urge the Commission to find no probable cause to believe in this matter, or in the alternative, to mandate the General Counsel to immediately enter into conciliation on this matter.

On February 19, 1980, the FEC sent its original notification letter in this matter. This letter based upon the same matching funds submission documents which are the subject of the February 6, 1981 notification to Citizens for LaRouche, charged a Citizens for LaRouche campaign volunteer, Debra Freeman, with knowing and willful violations of 26 U.S.C. 9042, a criminal violation of the law, and 2 U.S.C. 441(f). Despite the legal and constitutional questions raised by charging a volunteer who submitted no documentation to the Federal Election Commission with violations of the Act regarding submissions of the campaign committee, Dr. Freeman responded to the original MUR by suggesting a meeting with the FEC at her counsel's office in Baltimore to resolve any questions the Commission might have concerning her activities as a volunteer for Citizens for LaRouche. Neither Dr. Freeman or her attorney were contacted by the FEC concerning a meeting to resolve the matter promptly.

81 MAR 27 P12:00

On March 27, 1980, Debra Freeman called the General Counsel's office to inquire about the proposed meeting and also to inform the Commission that her attorney, Robert Prem was very ill and suggested that the Commission contact someone else in Mr. Prem's office about the proposed meeting. Either Marsha Gentner or Kevin Smith of the General Counsel's office refused to talk to another attorney from Mr. Prem's office and stated to Mrs. Freeman that she should get another attorney or represent herself in this matter and so notify the Commission. On the same day as the Commission was notified by Mrs. Freeman that in the opinion of the General Counsel's office, she was without legal representation due to her attorney's illness, subpoenas were issued for her bank account and that of her husband in Baltimore. The General Counsel's office apparently decided not to pursue these subpoenas.

During April and May of 1980, Mrs. Freeman's new counsel, Peter Parker attempted on many occasions to set up a meeting with the General Counsel's office to get a determination on what he saw, according to his account, as a possible highly technical violation of the law without any intent involved or alternatively, depending on what the General Counsel's interpretation of the practice in question was, no violation of the law at all. The FEC's General Counsel's office repeatedly refused such a meeting and its inherent approach to conciliation. Instead, on July 7th, the Commission issued subpoenas to all the money order contributors in question for their deposition. CFL believes this was done without the Commission's knowledge that Debra Freeman and her attorney were attempting to resolve the entire matter informally or through a formal conciliation agreement. Debra Freeman states that in terms of one of the money order contributors subject to the original FEC investigation, Dr. Harold Harrison she contacted him during this period and informed him of the FEC investigation. He stated to her that if the FEC ever questioned his contribution he would deny knowing Citizens for LaRouche and deny giving any money to the campaign committee.

On August 15, 1980 depositions of Baltimore money order contributors known to Citizens for LaRouche to be the subject of deposition notices took place. These persons included Charles Clark, Ernest Pulsifer, Kevin Salisbury, Nancy Radcliffe, David Sanders and Debra Freeman. These persons all appeared for deposition and were fully cooperative with the Commission's attorneys, despite the fact that what should have been a simple verification process as to whether or not the contributor gave the amount and money order in question was utilized to conduct a fishing expedition on the personal lives and political beliefs of contributors. Additionally, Attorneys for the Commission persisted in an endless harangue about handwriting samples from Mrs. Freeman, presumably to prove some type of forgery charge, despite the fact that she truthfully answered that she signed certain money orders believing there was nothing wrong with

such a practice and,in fact,this practice was required by the Federal Election Campaign Act and the entire intent of the statute. Citizens for LaRouche recommends that the Commission examine these depositions and the conduct of its counsel therein before making any determination of this matter. Citizens for LaRouche believes Commissioners familiar with the legislative intent of the Federal Election Campaign Act and the U.S. Constitution will find that this process, as we have reconstructed it from interviews of the persons depositioned, would never meet the approval of conscientious commissioners.

On August 29, 1980 when Debra Freeman contacted Gore Brothers reporting service to arrange for copying of the depositions so that contributors could review them and correct any errors in the presense of counsel, Gore Brothers Reporting Service told her, she states, that the depositions could only be signed individually at Gore Brothers on orders from the FEC's General Counsel's office. Since this instruction violated the spirit if not the letter of the Federal Rules of Civil Procedure, the depositions remain unsigned and uncorrected.

On February 6, 1981 the Commission sent its new notification letter under MUR 1158, this time naming Citizens for LaRouche and Felice Gelman as respondents to the same factual items, now butressed by the General Counsel's office conclusions concerning the investigation it already conducted with Debra Freeman as the respondent. There has been no notification to Debra Freeman as to whether the original charges concerning her conduct are closed, despite the fact that she did not have the legal responsibility for submitting documentation to the Commission in the first place--the Committee did and it was the Committee which should have been named in this MUR in the first place. CFL believes the General Counsel's office chose the prior course in order to directly harass CFL contributors in a legal process which could and should have been handled by letter and certified statement and to attempt to make out a case for violations which could have been readily resolved in the first instance by CFL. Now with CFL named as respondent to an investigation involving the same factual matters, it is unclear to us whether the General Counsel's office intends to expend more time and money re-investigating the same factual matters already before it in the hopes of substantiating charges against the Committee. We find this entire process to be totally dubious from a Constitutional, due process and procedural standpoint and from the standpoint of the Commission's own practices and procedures. With this background taken into account we now address the de minimus factual situation which has given rise to all of this time and expense.

In its February 6, 1981 Factual and Legal Analysis the General Counsel's office states that Ann Taylor and Harold Harrison have provided the Commission with information indicating they did not make the contributions submitted by CFL to the Federal Election Commission.

Citizens for LaRouche has been unable to obtain from Ann Taylor the verification form it utilized to confirm money order contributions. Under the normal procedures of the Commission, the fact that CFL is unable to verify this contribution would result in the contribution being kicked out of the submission for matching monies--a situation which your audit staff has been aware of ever since the original submission of the Ann Taylor contribution without the verification statement. Under the General Counsel's offices procedures in this investigation the only method for CFL and the FEC to resolve this question would be confrontation between Ann Taylor and the CFL volunteer who collected her contribution, apparently at a fundraiser, to determine who is telling the truth regarding the contribution. Our volunteers state that Ann Taylor definitely did give the contribution in question.

As regards Harold Harrison, a verification statement, apparently signed by him was submitted to the Commission along with his cashier's check. As noted before, Dr. Harrison stated to Mrs. Freeman that he would not become involved in an FEC investigation and would deny giving money to CFL or knowing CFL in order to avoid such an investigation. Due to the contrary nature of the General Counsel's offices findings and the CFL submission, Dr. Harrison may become involved directly in an FEC investigation as CFL and the FEC attempt to actually verify the record of this contribution.

In its analysis, the General Counsel's office then goes on to state that Charles Clark, Ernest Pulsifer, Kevin Salisbury, Nancy Radcliffe and David Sanders made contributions in cash to CFL. CFL in turn failed to refund that portion of the cash contribution in excess of $100.00, according to the analysis, and instead purchased money orders with the cash and submitted the money orders to be matched by the Commission. The legal analysis goes on to state that the money orders contained an "apparent" signature of the contributor although Clark, Pulsifer, Radcliffe, Salisbury and Sanders "did not sign those money orders."

As regards David Sanders, this statement is not even remotely close to reality. Sanders only contribution under examination by the Commission exceeding $100.00 was, CFL believes, a Household Finance check payable to him which was signed over to CFL by him as a contribution. Thus, it was not a cash transaction of any sort.

In its analysis of the Clark, Pulsifer, Salisbury and Radcliffe "excess cash" contributions and in the insinuations drawn from the apparent fact that money orders were not signed by contributors, the General Counsel's office is engaged in a most willful distortion of the reality of the situation. CFL has absolutely no access to the General Counsel's information challenging the Taylor and Harrison contributions. If it is similar,however,to the information upon which the General Counsel's office challenges these other contributions, it should be dismissed outright by the Commission.

While CFL is not privy to the testimony of its contributors in the previous investigation of Dr. Freeman and was specifically excluded from such information and commenting upon it by the General Counsel's office, most of the contributors have communicated in some form what was said. Each contributor verified the contribution to Citizens for LaRouche. Each contributor stated that the contribution came from their own funds. Therefore there is no question of contributions in the name of another.

Citizens for LaRouche, as opposed to the Analysis, did not receive these contributions in cash. These contributions were received by Citizens for LaRouche in the form of money orders at its New York offices. The money orders were in turn submitted to the Federal Election Commission for certification as matching funds. In the course of the threshold submission to the FEC's audit staff, the audit staff refused to verify unsigned money orders and money orders not signed by contributors. Pursuant to CFR 9034.2(c)(2) and the instructions of the Audit Staff, CFL routinely verified by verification letter all money orders received which either by its own spot check or by rejection from the audit staff, did not contain the signature of the contributor. Thus, except for Ann Taylor, verification letters were submitted on all of these questioned money order contributions to the Audit Staff at which point the contributions were certified for matching funds. At no time did the Audit Staff warn CFL that there was any serious violation in this procedure--in fact the Audit Staff certified the contributions for matching funds. The money orders under examination themselves only contain a space for the name and address of purchaser and in most cases, no signature space or requirement.

The testimony in the previous investigation of Dr. Freeman demonstrates, we believe, that a CFL volunteer was approached by an individual who had cash and who wished to give more than $100.00 to Citizens for LaRouche. The volunteer insisted that CFL could not receive and she could not receive cash contributions for CFL in excess of $100.00. At that point either a money order was purchased by the contributor and filled out by the volunteer or, depending on the exigencies of the situation, a money order was purchased and filled out for the contributor. These contributions were subsequently verified via written instrument containing the signature of the contributor. Thus, the General Counsel's office

makes criminal mountains and regulatory violations out of the following analysis of the law:

(a) Under the most technical interpretation of the Act, it is appropriate for a volunteer to accept only those money order contributions in which the contributor has previously, in circumstances totally unknown to the volunteer, purchased a money order and physically filled it out and hands it to the volunteer.

(b) CFL is responsible for criminal violations of the Act because it did not check into the circumstances of each and every money order contribution with its volunteers before its submission to insure that it complied with the reading of the law contained in (a) and because it relied on the practice of the Commission's own audit staff in telling it how to document money order contributions for matching funds purposes without knowledge that the General Counsel's office was interpreting the statute pursuant to (a) and without knowing that its volunteers in their good faith efforts to comply with the Act may have been violating the General Counsel's ruling on the law pursuant to (a).

The volunteer converted a cash"contribution" to a money order for purposes of complying with the act either by telling the contributor to purchase a money order or by arranging the purchase of a money order with the contributor's funds and processing it. But at what point here is a contribution a cash contribution? CFL did not receive funds in cash. The volunteer did not even ultimately receive funds in cash. Additionally, every effort was made to substantiate unsigned money orders by the signature of the contributor.

The total amount of contributions in dispute here is a little over $2500.00. When the Sanders contribution is subtracted from this sum as a clear written instrument, the amount in dispute is a little over $1500.00. The cash contribution prohibition was established to prevent large sums of cash from flowing, unaccounted for, into political campaigns. The fact that a volunteer's good faith efforts to meet every letter of legal and legislative intent known to the volunteer are now used to concoct charges against the volunteer and the Committee is a perversion of the Federal Election Campaign Act.

For all of the foregoing reasons, Citizens for LaRouche respectfully requests that the Commission find no probable cause to believe in this matter and close it. In the alternative, the Commission must mandate conciliation which should have been its approach at the beginning of this lengthly proceeding.

Sincerely,

Barbara Boyd
by JFS

GCC#4355

DATE: March 18, 1981

TO: Federal Election Commission

FROM: Citizens for LaRouche

RE: Appearance of Counsel

Please take notice that Citizens for LaRouche does hereby designate James F. Schoener of the firm of Miller, Canfield, Paddock and Stone as its attorney and counsel for any and all matters, communications, notices, subpoenas and service of process that your Commission may have concerning our Committee.

The present address for Mr. Schoener is Suite 1240, 1015-15th Street, N.W., Washington, D.C. 20005, and his telephone numbers are 789-8690 and 822-9333.

This notice of representation and appearance shall continue until revoked in writing.

Citizens for LaRouche

By Patricia Dolbeare
Patricia Dolbeare,
Treasurer

11 MAR 27 A10:48

DATE: March 18, 1981

TO: Federal Election Commission

FROM: Citizens for LaRouche

RE: Appearance of Counsel

Please take notice that Citizens for LaRouche does hereby designate James F. Schoener of the firm of Miller, Canfield, Paddock and Stone as its attorney and counsel for any and all matters, communications, notices, subpoenas and service of process that your Commission may have concerning our Committee.

The present address for Mr. Schoener is Suite 1240, 1015-15th Street, N.W., Washington, D.C. 20005, and his telephone numbers are 789-8690 and 822-9333.

This notice of representation and appearance shall continue until revoked in writing.

Citizens for LaRouche

By Patricia Dolbeare
Patricia Dolbeare,
Treasurer

1 MAR 27 A10:48

912349

GCC 4061

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

2033 M STREET, N.W.
WASHINGTON, D.C. 20036

(202) 293-2505

MERLE R. JENKINS*
DENNIS H. NYSTROM*
MICHAEL A. STERLACCI*
JAMES F. SCHOENER*
STEPHEN J. HITCHCOCK
CHRIS M. PARFITT
GARY J. NYSTROM
CHARLES M. LOWTHER
MICHAEL A. MURPHY*△
JAMES M. SCHOENER
GERARD P. PANARO*+
JANIS B. DeGENNARO
ROBERT J. DeLUCIA*
RICHARD A. PEARSON*
MICHAEL J. TAUSCHER

OF COUNSEL
JOHN B. CONLAN*
JOHN F. GOETZ

MICHIGAN OFFICE
15999 WEST TWELVE MILE ROAD
SOUTHFIELD, MICHIGAN 48076
(313) 559-2828

*ADMITTED IN D.C.
△ADMITTED IN VA.
+ADMITTED IN MD.

February 25, 1981

Robert Bogin, Esquire
c/o Charles H. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MAR 2 1981 P2:57

Re: MUR 1158

Dear Mr. Bogin:

Your notice dated February 6, 1981 in the above-entitled MUR was received by my clients on February 13, 1981. It was forwarded to my office, arriving February 18, 1981. I called you this morning concerning this matter and protested the fact that your office continues to ignore the general appearance I have filed in behalf of the respondent, Citizens for LaRouche, Inc. If a general appearance is of no use to your Commission, I would appreciate knowing it; I assumed under 11 C.F.R. 111.23 that I would at least receive a copy of matters addressed to my clients.

Please advise if you will or will not respect my appearance as counsel in the future!

Very truly yours,

James F. Schoener

JFS:djb

LAW OFFICES
JENKINS, NYSTROM & STERLACCI, P.C.
2033 M STREET, N.W.
WASHINGTON, D. C. 20036





Robert Bogin, Esquire
c/o Charles H. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
GENERAL COUNSEL

LAW OFFICES
JENKINS, NYSTROM & STERLACCI, P.C.
2033 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 293-2505

MERLE R. JENKINS*
DENNIS H. NYSTROM*
MICHAEL A. STERLACCI*
JAMES F. SCHOENER*
STEPHEN J. HITCHCOCK
CHRIS M. PARFITT
GARY J. NYSTROM
CHARLES M. LOWTHER
MICHAEL A. MURPHY*△
JAMES M. SCHOENER
GERARD P. PANARO*+
JANIS B. DeGENNARO
ROBERT J. DeLUCIA*
RICHARD A. PEARSON*
MICHAEL J. TAUSCHER

OF COUNSEL
JOHN E. SONDAY
JOHN P. GOETZ

MICHIGAN OFFICE
15999 WEST TWELVE MILE ROAD
SOUTHFIELD, MICHIGAN 48076
(313) 559-2828

*ADMITTED IN D.C.
△ADMITTED IN VA.
+ADMITTED IN MD.

81 FEB 13 PM 5: 02

February 13, 1981

HAND DELIVERED

Charles Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MURs 1186 and 1158, F.E.C. audit, and all other 1979-1980 Citizens for LaRouche, Inc. activities

Dear Mr. Steele:

For well over a year and one-half, the F.E.C. has been engaged in unending investigation of the campaign finances of the Citizens for LaRouche, Inc. As you are well aware, it has been our consistent position that the investigation has focused on de minimis, technical violations. Even more important, it has been conducted in blatant disregard of the due process provisions of the Constitution, as well as the procedural safeguards and requirements of the Federal Election Campaign Act and the Commission's own regulations.

After countless attempts to get the Commission to voluntarily cease its illegal activities, the Citizens for LaRouche, Inc. was forced to seek legal redress last October. We obtained an injunction from Judge Flannery of the United States District Court for the District of Columbia in the case of Felice M. Gelman v. F.E.C., Civil Action No. 80-2471. That injunction prohibited the F.E.C. from conducting any further investigation of the C.F.L. Committee until the F.E.C. first complied with the procedures set forth in §437g(a)(2) and 11 C.F.R. Part 111. This included giving notice to the C.F.L. before issuing subpoenas to, or otherwise inquiring into contributions by, contributors and fundraisers for the C.F.L. The F.E.C. did not appeal this order. Consequently, we assumed that the F.E.C. would cease its illegal activities and would conduct any further investigations in accordance with the provisions of Judge Flannery's order.

Our trust that the F.E.C. would abide Judge Flannery's order has been misplaced! Behind our backs, with no notice to the C.F.L. committee, and in flagrant disregard of Judge Flannery's order, the F.E.C. has proceeded to issue subpoenas to the same contributors and fundraisers who were involved in the investigation that Judge Flannery had ordered halted. Specifically, the F.E.C. has again issued subpoenas to Sam and Antoinette Kahl, William Jennings, Robert Musmansky, and John Billows to appear in Portland, Oregon on February 26, 1981. In addition, a subpoena has been issued to a Mr. Martin Simon of Los Angeles for the following day. Undoubtedly, there are other subpoenas that are presently outstanding, but given the F.E.C.'s continuing failure to give notice to the C.F.L. and its counsel, we have only learned of the five (5) subpoenas that we itemize above.

Of course, we could go into court at this stage and have the subpoenas quashed, and possibly obtain a contempt order against the F.E.C., and you and Mr. Bogin in particular. The grounds for this relief were spelled out by Judge Flannery in his order:

> "...the defendant Federal Election Commission, its agents and employees, be and hereby are, permanently enjoined, from conducting any investigation of, including contacting by mail or telephone and issuing subpoenas to, contributors to and volunteers for Citizens for LaRouche, Inc., unless plaintiffs are given prior notice of such investigatory actions, including, but not limited to detailed description of the factual allegations and staff report, as required under 11 C.F.R. Part 111."

Neither, we as counsel, nor anyone at the C.F.L. has received the notice that Judge Flannery's order mandates.

In consultation with our client, we are willing to postpone another trip to court in a desire to conclude these matters. It is simply hightime that this fruitless fishing expedition by the F.E.C. come to an end. From what we have been able to discern, the total amount of contributions that have been scrutinized in all of these investigations and audits has never exceeded even $1,000.00. Yet in dogged pursuit of this minimal amount, the F.E.C. has easily expended ten thousand dollars ($10,000.00) and is on the verge of spending thousands more by flying at least two of its ace attorneys out to the West Coast to ask questions of the harassed contributors. While it is unconscionable that the F.E.C. would so recklessly consume and waste the public treasury on this idiotic search, the real tragedy of this entire affair has been the immense costs that the C.F.L. has been put through. C.F.L.

has had to respond to each of these attacks by the F.E.C. and has seen thousands of dollars of its contributors' funds consumed in legal and accounting costs and related expenses.

Let us call a halt to this farce! Accordingly, we propose that the F.E.C. and the C.F.L. enter into conciliation negotiations, pursuant to 2 U.S.C §437g(a)(4)(A)(i), immediately. As a first step, the F.E.C. would withdraw the subpoenas that it has issued to the five (5) persons listed above (as well as any other subpoenas that may be outstanding and relating to the C.F.L. and its contributors and fundraisers). In return, the C.F.L. will refrain from going into court to obtain a contempt order against the F.E.C. from Judge Flannery.

The conciliation negotiations, and eventual agreement, must encompass all matters relating to the 1979-1980 activities of the Citizens for LaRouche, Inc. Anything less would do an injustice to everyone. We must finally resolve the various allegations which the F.E.C. has been raising. To try and do so on a piecemeal basis would simply generate more of the unending litigation which is consuming the resources of both the F.E.C. and the C.F.L. at a time when both parties are facing pressures to cut costs.

Consequently, counsel for C.F.L. requests that, by the end of business on Thursday, February 19, 1981, the F.E.C. inform the Committee, via the undersigned counsel, that it has withdrawn the subpoenas discussed above, and is willing to enter into conciliation negotiations. Otherwise, the F.E.C. can be assured that on Friday, February 20, 1981, the C.F.L. will bring this matter before Judge Flannery and request that the F.E.C. be held in contempt of court and that the appropriate civil sanctions be imposed. In addition, the C.F.L. will take whatever further legal actions are necessary to prevent the undeniably illegal depositions.

We eagerly await your response.

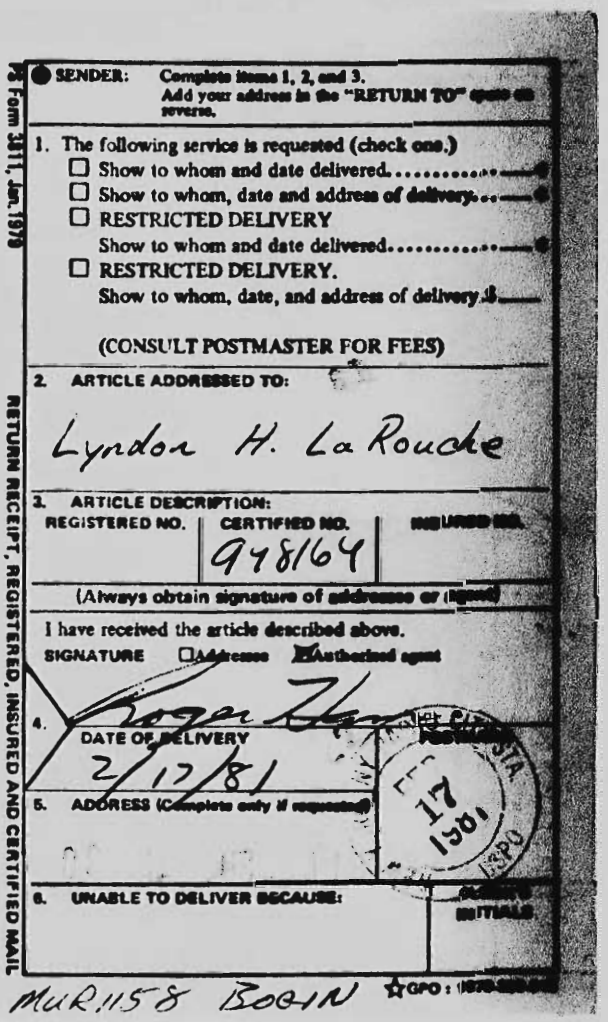
Very truly yours,

James F. Schoener

James F. Schoener

JFS:djb

cc: Chairman John McGarry
Commissioner Frank Reiche
Commissioner Joan Aikens
Commissioner Thomas Harris
Commissioner Robert O. Tiernan
Commissioner Vernon Thomson
Mr. Robert Bogin



PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☐ Show to whom and date delivered.....¢
   - ☐ Show to whom, date and address of delivery.....¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered.....¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.¢

   (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Lyndon H. LaRouche

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	948164	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. Roger Zhou

DATE OF DELIVERY 2/17/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK FEB 17 1981 USPO

INITIALS

MUR 1158 BOGIN

☆GPO : 1978-

1 3 1 0 3 6 7 1 5 3 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Post Office Box 976
Radio City Station
New York, New York 10019

Re: MUR 1158

Dear Ms. Gelman:

This letter is to notify you that the Federal Election Commission in the normal course of its supervisory responsibilities has found reason to believe that your committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against your committee in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

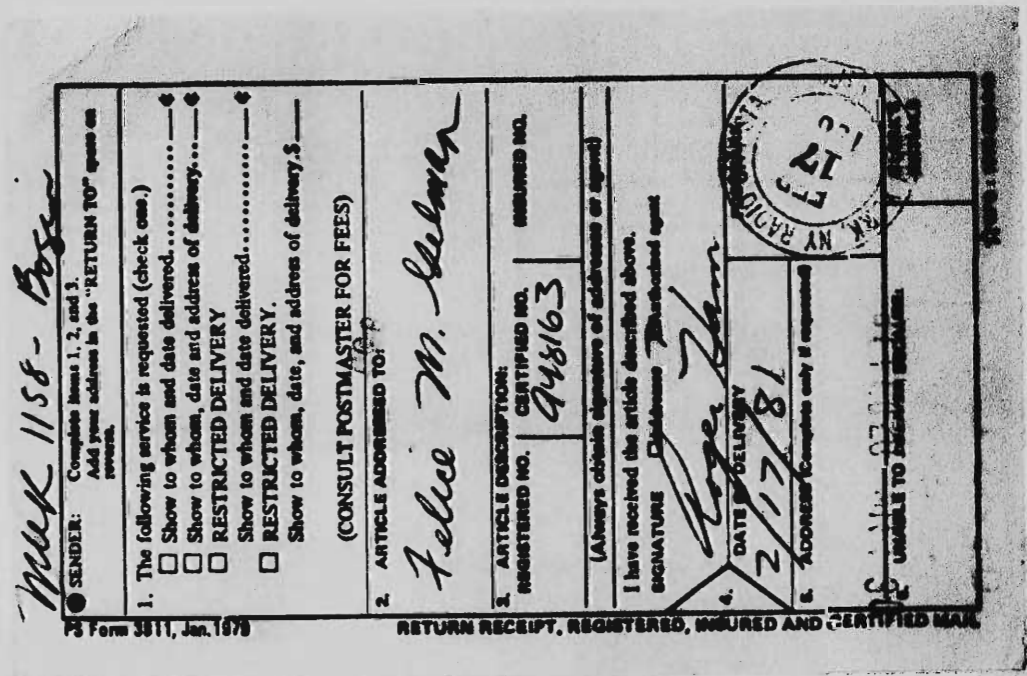
If you have any questions concerning this matter, please contact Robert Bogin, the attorney assigned to this matter at (202) 523-4000. Thank you for your cooperation.

Sincerely,

JOHN WARREN McGARRY
Chairman

cc: Lyndon H. LaRouche, Jr.

Enclosures
Summary of Possible Violations
Procedures



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Post Office Box 976
Radio City Station
New York, New York 10019

Re: MUR 1158

Dear Ms. Gelman:

This letter is to notify you that the Federal Election Commission in the normal course of its supervisory responsibilities has found reason to believe that your committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against your committee in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions concerning this matter, please contact Robert Bogin, the attorney assigned to this matter at (202) 523-4000. Thank you for your cooperation.

Sincerely,

cc: Lyndon H. LaRouche, Jr.

Enclosures
Summary of Possible Violations
Procedures

Prepared by Robert I. Bogin:ano 1/13/81 RB 1/13
Cleared by

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE February 6, 1981

MUR NO. 1158
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for LaRouche

Robert Bogin (202) 523-4000

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was generated from a referral by the Audit Division of matters noted during its review of the third matching fund submission for presidential primary matching funds made by Citizens for LaRouche (CFL).

FACTUAL BASIS AND LEGAL ANALYSIS

As a result of a referral from the audit division of matters noted during its review of CFL's third matching fund submission, the Commission has information that contributions submitted by CFL for matching funds purportedly made by Ann Taylor and Harold Harrison were not made by these individuals. In addition, Charles Clark, Ernest Pulsifer, Kevin Salisbury, Nancy Radcliffe and David Sanders made contributions to CFL in cash, and except for Mr. Clark, these contributions exceeded $100. The CFL, through its agents, failed to refund that portion of the cash contribution in excess of $100. Furthermore, CFL purchased money orders with the cash and submitted the money orders to the Commission to be matched. The money orders effecting these cash contributions contained an apparent signature of the contributor. However, the Commission has information that Clark, Pulsifer, Radcliffe, Salisbury and Sanders did not sign those money orders submitted to the Commission to be matched.

2 U.S.C. § 441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another.

2 U.S.C. § 441g states:

> No person shall make contributions of currency of the United States...to or for the benefit of any candidate which, in the aggregate, exceeds $100.

11 C.F.R. § 110.4(c)(2) states:

> A candidate or committee receiving a cash contribution in excess of $100 shall promptly return the amount over $100 to the contributor.

11 C.F.R. § 9034.3(k) states:

> A contribution to a candidate other than one which meets the requirements of 11 C.F.R. § 9034.2 is not matchable. Contributions which are not matchable include contributions of currency of the United States.

26 U.S.C. § 9042(c) states:

> It is unlawful for any person knowingly and willfully to furnish any false, fictitious or fraudulent evidence books, or information to the Commission under this chapter, or to include in any evidence books or information so furnished any misrepresentation of a material fact or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission...

Based on the foregoing analysis, the Federal Election Commission has found:

Reason to believe that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. § 110.4 (c)(2) and 26 U.S.C. § 9042(c).

January 29, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

PAKayson

cc: Bogin

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: FEBRUARY 5, 1981

SUBJECT: MUR 1158 - Meorandum to the Commission dated 2-3-81; Received in OCS 2-3-81, 3:12

The above-named document was circulated to the Commission on a no-objection basis at 11:00, February 4, 1981.

There were no objections to the errata regarding the recommendation in the General Counsel's Report in MUR 1158 dated January 29, 1981.

February 3, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Please have the attached Memo to the Commission distributed to the Commission on a 24 hour basis. Thank you.

Attachment

pakayson

cc: Bogin

2 0 3 7 1 3 4 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEC MAIL
SECRETARY
81 FEB 3 P3: 12

February 3, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Errata - MUR 1158

The recommendation in the General Counsel's Report in MUR 1158 dated January 29, 1981 should be amended to delete a proposed finding of reason to believe that Citizens for LaRouche violated 11 C.F.R. § 9034.4(K). The recommendation should read as follows:

> Find reason to believe that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. § 110.4(c)(2) and 26 U.S.C. § 9042(c).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Debra Hanania Freeman) MUR 1158

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 2, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1158:

1. Find REASON TO BELIEVE that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. §§ 9034.4(k) and 110.4(c)(2) and 26 U.S.C. §9042(c).

2. Notify respondent.

Commissioners Aikens, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

2/2/81
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 1-29-81, 11:59
Circulated on 48 hour vote basis: 1-29-81, 4:00

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
81 JAN 29 A11:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1158
Debra Hanania Freeman)

GENERAL COUNSEL'S REPORT

On February 12, 1980, the Commission found reason to believe that Debra Hanania Freeman violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by falsifying contributor information and documentation submitted to the Commission for matching fund payments and by contributing $250 in the name of Dr. Harold Harrison. On June 24, 1980, the Commission authorized the taking of depositions of respondent and seven witnesses. The depositions were completed in August 1980, and all subpoenaed parties were deposed except Dr. Harrison who answered interrogatories. The transcripts of the depositions were received in September. Progress on this matter was delayed pending the lawsuit of Gelman v. FEC, Civil Action No. 80-2471 (D.D.C. October 24, 1980). However, the lawsuit has been decided, and this matter can now proceed.

I. Deposition Evidence

A. Debra Hanania Freeman

Respondent testified that she is a volunteer for Citizens for LaRouche. Her husband is Mid-Atlantic campaign coordinator for CFL. Respondent was asked to work on the campaign by Felice Gelman, the treasurer of CFL. As a volunteer, respondent was involved in the day to day operations of running the CFL campaign in the Baltimore, Maryland, area. Respondent was active in fundraising

and very often it was respondent who would mail the fundraising proceeds and contributions directly to the New York headquarters of CFL.

Respondent testified that she purchased a cashier's check for Dr. Harold Harrison using $250 in cash allegedly contributed by Dr. Harrison. Respondent also admitted that she bought money orders for Ernest Pulsifer, Edward St. John, David Sanders, Charles Clark, Nancy Radcliffe and Rustom Ghandi, and may have purchased money orders for Kevin Salisbury, Steve Warm and Belinda de Gracia. Respondent further testified that she filled out the contributor information card which accompanied contributions made by Ann Taylor and Constantine Philios.

B. Ann A. Taylor

Witness testified that she never contributed to CFL and to the best of her knowledge has not purchased money orders in the last couple of years. When shown a money order purportedly signed by the witness and made payable to CFL, the witness testified that she did not purchase the money order, that she never saw the money order before the deposition and that it was not her signature on the money order. The witness had no explanation how a money order with her name and address could possibly have been contributed to CFL.

C. Charles Clark

Witness testified that he made small cash contributions to CFL usually in $5 amounts, and that Steven Warm, Debra Freeman, and Lawrence Freeman usually received his contributions. Witness further

testified that he did not purchase, sign or recognize money order payable to CFL for $70. The witness did sign a document dated February 21, 1980, which stated that he contributed $70 to CFL. This document was presented to the witness by Steven Warm.

D. Ernest K. Pulsifer

Witness testified that he made three separate cash contributions to CFL in the amounts of $100, $40 and $150. This money was given to Lawrence Freeman. Witness further testified that he did not sign or purchase money order payable to CFL in the amount of $150.

E. Kevin Salisbury

Witness testified that he gave money to Debby Freeman. Witness further testified that he did not purchase or sign two money orders payable to CFL in the amounts of $140 and $450 respectively. It should be noted that this witness could be characterized as a hostile witness and was fairly uncooperative. For instance, the witness repeatedly testified that he could not remember various matters concerning his contributions to CFL, including whether he made contributions in cash, the amounts of his contributions and whether he signed a document stating that he made a $450 contribution. Nonetheless, he did testify that he did not purchase or sign the two money orders relevant to this matter.

F. Nancy Radcliffe

Witness considered herself a volunteer campaign worker for CFL recruited by Debra and Lawrence Freeman. As a campaign worker, the witness did some fundraising for CFL. Witness testified that she made four or five contributions to CFL. One of these contributions included giving $250 in cash to Debra Freeman. Witness further testified that Debra Freeman purchased a money order with this cash which contained witness' name but not her signature and that Ms. Freeman presented the witness with a paper to sign evidencing her contribution. This document was produced at the deposition and was dated February 28, 1980. Witness also testified that Debra Freeman was one of several persons in charge of the CFL campaign in Baltimore and that all contributions collected by the witness including all cash contributions were turned over to Ms. Freeman.

G. David Sanders

Witness testified that he endorsed over as a contribution to CFL a Household Finance check in the amount of $1,009.58 payable to David Sanders. Documentation accompanying the contribution which was submitted to the Commission by CFL for matching payments, indicated that the contribution was made by the witness and his wife, Lenore. However, the name of the witness' wife is Diana Sayoun. The witness could not explain this inconsistency. The document accompanying the contribution attributes one-half of the contribution to his wife. This document was given to him to sign by Debra Freeman.

In addition, two money orders in the amounts of $25 and $45 were neither purchased nor signed by the witness. Documentation accompanying the $45 money order was also not signed by the witness. Witness did testify that he contributed cash to CFL from time to time.

H. George B. P. Ward, Jr.

Witness is a vice-president of Maryland National Bank, the bank where respondent maintains both a savings and checking account. Witness testified with respect to the cashier's check purchased by Debra Freeman in the name of Harold Harrison. Based on various documents in the bank's possession including withdrawal slips and a slip copy of the cashier's check, the witness was able to testify that Mr. Freeman withdrew $750 from her savings account of which she used $250 to purchase the cashier's check in issue.

II. Written Questions Under Order by Harold Harrison

In answers to various questions posed by the Commission, Dr. Harrison asserts that he never contributed to CFL, that he does not know an individual by the name of Debra Hanania Freeman and that he did not purchase, or have purchased in his name, a cashier's check from the Maryland National Bank. The witness further stated that he was never in contact with anyone he knew to be a representative of CFL.

III. Legal Analysis

2 U.S.C. § 441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another.

2 U.S.C. § 441g states:

> No person shall make contributions of currency of the United States...to or for the benefit of any candidate which, in the aggregate, exceeds $100.

11 C.F.R. § 110.4(c)(2) states:

> A candidate or committee receiving a cash contribution in excess of $100 shall promptly return the amount over $100 to the contributor.

11 C.F.R. § 9034.3(k) states:

> A contribution to a candidate other than one which meets the requirements of 11 C.F.R. § 9034.2 is not matchable. Contributions which are not matchable include contributions of currency of the United States.

26 U.S.C. § 9042(c) states:

> It is unlawful for any person knowingly and willfully to furnish any false, fictitious or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence books or information so furnished any misrepresentation of a material fact or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission...

Based on the evidence on hand, the Commission has reason to believe that CFL violated all the above-noted statutory provisions.

Testimony by Ann Taylor and Harold Harrison reveals that these two individuals never made a contribution to CFL. Based on the testimony of Debra Hanania Freeman, Ms. Freeman purchased the cashier's check for Dr. Harrison and probably filled out the

contributor information accompanying Mrs. Taylor's contribution. At this time, it is unclear who purchased the money order that effected the purported contribution by Ann Taylor. Nonetheless, there is reason to believe that CFL, through its agent, knowingly and willfully falsified information furnished to the Commission relevant to a Commission certification for matching funds. In addition, these facts also give rise to a violation of 2 U.S.C. § 441f. Thus, the Commission has reason to believe that the Committee accepted contributions in the name of Harrison and Taylor which it knew was made by another.

Testimony by Clark, Pulsifer, Salisbury, Radcliffe and Sanders reveal that each of these individuals admitted to making cash contributions to CFL and except for Clark, these contributions exceeded $100. The Committee, through its agents, failed to refund the excessive cash contributions in violation of 11 C.F.R. § 110.4 (c)(2). In addition, the Committee purchased money orders with the cash and submitted the money orders to the Commission for matching funds. 26 U.S.C. § 9034 and 11 C.F.R. § 9034.3(k) does not permit cash contributions to be matched. By purchasing money orders with the cash and then submitting the money orders as contributions to be matched, the Committee is in effect having cash contributions matched. Furthermore, the money orders effecting these cash contributions contained an apparent signature of the contributor. However, the testimony demonstrates that Clark, Pulsifer, Radcliffe, Salisbury and Sanders did not sign those money orders submitted to the Commission to be matched. For all

these reasons, the Commission has reason to believe that the Committee, through its agents, violated 26 U.S.C. § 9042(c) by knowingly and willfully furnishing fraudulent information to the Commission and by misrepresenting material facts relevant to a certification by the Commission for matching funds. In addition, the Commission has reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to refund cash contributions which exceeded, in the aggregate, $100. The Commission also has reason to believe that the documentation containing the purported signature of David Sander's wife was frandulently produced in violation of 26 U.S.C. § 9042(c).

RECOMMENDATIONS

1. Find reason to believe that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. §§ 9034.4(k) and 110.4 (c)(2) and 26 U.S.C. § 9042(c).
2. Notify respondent.

29 January 1981
Date

Charles N. Steele
General Counsel

Attachment:
Letter to Respondent
General Counsel's Factual and Legal Analysis

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Post Office Box 976
Radio City Station
New York, New York 10019

Re: MUR 1158

Dear Ms. Gelman:

This letter is to notify you that the Federal Election Commission in the normal course of its supervisory responsibilities has found reason to believe that your committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against your committee in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions concerning this matter, please contact Robert Bogin, the attorney assigned to this matter at (202) 523-4000. Thank you for your cooperation.

Sincerely,

cc: Lyndon H. LaRouche, Jr.

Enclosures
Summary of Possible Violations
Procedures

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. 1158
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for LaRouche

Robert Bogin (202) 523-4000

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was generated from a referral by the Audit Division of matters noted during its review of the third matching fund submission for presidential primary matching funds made by Citizens for LaRouche (CFL).

FACTUAL BASIS AND LEGAL ANALYSIS

As a result of a referral from the audit division of matters noted during its review of CFL's third matching fund submission, the Commission has information that contributions submitted by CFL for matching funds purportedly made by Ann Taylor and Harold Harrison were not made by these individuals. In addition, Charles Clark, Ernest Pulsifer, Kevin Salisbury, Nancy Radcliffe and David Sanders made contributions to CFL in cash, and except for Mr. Clark, these contributions exceeded $100. The CFL, through its agents, failed to refund that portion of the cash contribution in excess of $100. Furthermore, CFL purchased money orders with the cash and submitted the money orders to the Commission to be matched. The money orders effecting these cash contributions contained an apparent signature of the contributor. However, the Commission has information that Clark, Pulsifer, Radcliffe, Salisbury and Sanders did not sign those money orders submitted to the Commission to be matched.

2 U.S.C. § 441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another.

2 U.S.C. § 441g states:

> No person shall make contributions of currency of the United States...to or for the benefit of any candidate which, in the aggregate, exceeds $100.

11 C.F.R. § 110.4(c)(2) states:

> A candidate or committee receiving a cash contribution in excess of $100 shall promptly return the amount over $100 to the contributor.

11 C.F.R. § 9034.3(k) states:

> A contribution to a candidate other than one which meets the requirements of 11 C.F.R. § 9034.2 is not matchable. Contributions which are not matchable include contributions of currency of the United States.

26 U.S.C. § 9042(c) states:

> It is unlawful for any person knowingly and willfully to furnish any false, fictitious or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence books or information so furnished any misrepresentation of a material fact or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission...

Based on the foregoing analysis, the Federal Election Commission has found:

Reason to believe that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. §§ 9034.4(k) and 110.4 (c)(2) and 26 U.S.C. § 9042(c).

these reasons, the Commission has reason to believe that the Committee, through its agents, violated 26 U.S.C. § 9042(c) by knowingly and willfully furnishing fraudulent information to the Commission and by misrepresenting material facts relevant to a certification by the Commission for matching funds. In addition, the Commission has reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to refund cash contributions which exceeded, in the aggregate, $100. The Commission also has reason to believe that the documentation containing the purported signature of David Sander's wife was frandulently produced in violation of 26 U.S.C. § 9042(c).

RECOMMENDATIONS

1. Find reason to believe that Citizens for LaRouche violated 2 U.S.C. §§ 441f and 441g, 11 C.F.R. §§ 9034.4(k) and 110.4 (c)(2) and 26 U.S.C. § 9042(c).
2. Notify respondent.

_____
Date

_____
Charles N. Steele
General Counsel

Attachment:
Letter to Respondent
General Counsel's Factual and Legal Analysis

RECEIPT

FEDERAL ELECTION COMMISSION

1325 K Street, N. W.
Washington, D. C. 20463

●18572

October 9, 1980
Date

The Federal Election Commission has received $ 2.90 in cash/check for the purchase of the following: 29 pages @ 5¢; _____ pages @ 10¢; _____ FEC Indexes or Reports; _____ FEC microfilm.

Public Records Office
Federal Election Commission

Purchaser understands any information copied from reports and statements shall not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. 2 U. S. C. Section 438

Russell G. DeVoe
Attorney at Law

2343 Foster Avenue
Parkville, Maryland 21234
301.665.7983

RECEIVED
910459
80 OCT 8 P12:53
OCC #2908

October 7, 1980

0 OCT 8 P1:57

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Attention: Robert Bogin

Re: MUR 1158
Deposition of
Ernest K. Pulsifer

Dear Mr. Bogin:

Please find enclosed my check for $2.90 to cover the cost of copying the captioned deposition.

Thank you for your cooperation in this matter.

Very truly yours,

Russell DeVoe

Russell DeVoe

RD:blv
Enclosure 1

Russell G. DeVoe
Attorney at Law
2343 Foster Avenue
Parkville, Maryland 21234



Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RECEIVED
80 OCT 8 PM 2:53

ATTENTION: Robert Bogin

RUSSELL G. DEVOE
ATTORNEY AT LAW
2343 FOSTER AVE.
BALTIMORE, MD. 21234

286

Oct 6 1980 7-69/520

PAY TO THE ORDER OF Federal Election Commission $ 2 90/100

Two 90/100 DOLLARS

The Equitable Trust Company
Baltimore, Maryland

FOR Subscription Deposit 1980 Russell DeVoe

MUR1158

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

James F. Schoener
Jenkins, Nystrom and Sterlacci
2033 M Street, N.W.
Washington, D.C. 20036

Dear Mr. Schoener:

This letter will confirm the telephone conversations you had with Robert Bogin and Hal Ponder on August 28, 1980. At that time, it was agreed tha the depositions of your clients originally scheduled for August 26 and 27, 1980, are rescheduled for September 18 and 19, 1980. The following schedule is proposed:

Shari Waffle	September 18	9:00 a.m.
William Lerch	" "	10:00 a.m.
John Brown	" "	11:00 a.m.
Robert Pierce	" "	12:00 p.m.
Victoria Lacy	" "	2:30 p.m.
Janet Hart	" "	3:30 p.m.
Robert Hart	" "	4:30 p.m.
Mitchell Hirch	September 19	9:00 a.m.
Sander Fredman	" "	10:00 a.m.
Elliot Eisenberg	" "	11:00 a.m.

In addition to these ten individuals, the Commission has subpoenaed four other individuals to appear for depositions. These individuals are Theresa Seiler, Mel Klenetsky, Paul Greenberg and Kirby Ashley. During your telephone conversations, you stated that you would undertake efforts to notify these four individuals of the Commission's subpoena and have them appear for deposition. The proposed schedule for these individuals for the taking of their depositions is as follows:

Theresa Seiler	September 19	12:00 p.m.
Mel Klenetsky	" "	2:30 p.m.
Paul Greenberg	" "	3:30 p.m.
Kirby Ashley	" "	4:30 p.m.

The location for the taking of these depositions is Room 1500, 219 South Dearborn Street, Chicago, Illinois. Please notify Hal Ponder or Robert Bogin (523-4000) by September 12, 1980 if your clients do not intend to appear and testify at the rescheduled time.

Sincerely,

Charles N. Steele
General Counsel

0 3 7 4 0 3 6 7 1 7 5 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: OCTOBER 1, 1980

SUBJECT: MUR 1158 - Interim Investigative Report #1, dated 9-26-80; Signed 9-29-80; Received in OCS 9-29-80, 4:57

The above-named document was circulated to the Commission on a no-objection basis at 11:00, September 30, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

September 29, 1980

MEMORANDUJ TO: Marjorie W. Emmons

FROM: Jane Colgrove

SUBJECT: MUR 1158

Please have the attached Interim Investigative Report on MUR 1158 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

2 1 0 3 7 1 3 6 5 2

BEFORE THE FEDERAL ELECTION COMMISSION
September 26, 1980

80 SEP 29 P4:57

In the Matter of)
) MUR 1158
Debra Hanania Freeman)

INTERIM INVESTIGATIVE REPORT #1

On February 12, 1980, the Commission found reason to believe that respondent violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). On June 24, 1980, the Commission authorized subpoenas to respondent and seven witnesses. This Office has been successful in taking the depoistion of all the subpoenaed individuals except in one instance where we have answers to interrogatories. Copies of the deposition transcripts were received the first week of September. This Office is in the process of reviewing the transcripts of the testimony and a report will be forthcoming in about four weeks.

29 Sept 1980
Date

Charles N. Steele
General Counsel

WRITTEN QUESTIONS UNDER ORDER

RECEIVED
800-2472
80 AUG28 P12:05

TO: Harold E. Harrison, M.D.

RE: MUR 1158

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and have an affidavit signed by you, and notarized.

You are required to submit your answers within ten (10) days of your receipt to these questions.

You are hereby advised of the provisions of 2 U.S.C. § 437g (a)(12) which prohibits anyone from making public any Commission investigation and provides for a fine up to $5,000 for a violation of that provision.

Please set forth your answers in the spaces provided below each question and return this original with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

For the purposes of these written questions, the term "cashier's check" refers to a cashier's check issued by Maryland National Bank, Post Office Box 987, Baltimore, Maryland 21203, bearing the notation "[illegible]" near the upper right hand corner, also bearing the notation "[illegible]" in the upper right hand corner, and also bearing the following series of numbers across the bottom: "[illegible]."

1. State your full name.

Harold Edward Harrison

1a. State your current address.

5500 N. Charles St.
Baltimore, Md. 21210

1b. If you have lived at an address other than your current address set out above, since January 1, 1980, state that address.

80 AUG28 P1:38

2. Does the name HAROLD H. HARRISON, M.D., mean anything whatsoever to you?

No. Not with middle initial H

2a. Do you know, or have you ever known, an individual named Bertha Harrison or F.E. Harrison?

No

3. Do you know, or have you ever known an individual named, variously, Debra Hanania Freeman, Dr. Debra Hanania, or Debra Hanania?

No

3a. If your answer to 3 above is in the affirmative, did you ever give her any money?

3b. If your answer to 3a above is in the affirmative, when, in what amount, in what form, and for what purpose?

4. State your relationship, if any, with the Citizens to LaRouche Committee.

None. Violently disapprove.

4a. Are you in anyway familiar with the Lyndon LaRouche candidacy for the Democratic Presidential Nomination?

Only through newspaper reports

4b. Have you ever been contacted by a representative of the Citizens for LaRouche Committee for any reason whatsoever?

No

4c. If your answer to 4b above is in the affirmative, for what purpose?

4d. Have you ever made, or authorized to be made, a contribution in any form and in any amount, to the Citizens For LaRouche Committee?

No

5. Have you ever purchased, or had purchased in your name, a Cashier's Check from the Maryland National Bank in Baltimore, Maryland, during the month of January, 1980, in any amount whatsoever?

No

5a. If your answer to 5 above is in the affirmative, when, in what amount, and payable to whom?

Harold E. Harrison

Harold E. Harrison, M.D.

State of Maryland
City of Baltimore

The above statement has been sworn to before me this 26th day of August, 1980.

My Commission expires on July 1, 1982. Kathryn M. Jones
Notary Public

Seal

Harrison
5500 N. Charles St.
Baltimore, Md. 21210





RECEIVED

80 AUG 28 P12:05

Federal Election Commission
Washington, D.C. 20463

Attention: Charles N. Steele

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Hyacinth Bloomfield, Esq.
Office of General Counsel
American Express Corp.
American Express Plaza
125 Broad Street
New York, N.Y. 10004

RE: MUR 1158

Dear Ms. Bloomfield:

The Federal Election Commission has issued the attached subpoena and order which requires American Express to provide original money orders issued to certain named individuals.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

Mark 1158 - Bogan

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one.)

- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date and address of delivery.....¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Hyacinth Bloomfield, Esq.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	160976	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RECEIVED

N.Y. AUG 28 PM

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1978-288-848

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Hyacinth Bloomfield, Esq.
Office of General Counsel
American Express Corp.
American Express Plaza
125 Broad Street
New York, N.Y. 10004

RE: MUR 1158

Dear Ms. Bloomfield:

The Federal Election Commission has issued the attached subpoena and order which requires American Express to provide original money orders issued to certain named individuals.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/20/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA DUCE TECUM

TO: American Express Corp.
American Express Plaza
125 Broad Street
New York, N.Y. 10004

American Express is hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to provide the following original money orders, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), which investigation concerns a matter designated as MUR 1158:

AMEX Money Order No.	Purchase Date	Requestor
55-466-938-402	November 13, 1979	Charles Clark
55-466,938,403	November 15, 1979	Edward St. John
55-466,938,409	November 17, 1979	Rustom Ghandi
55-466,938,411	November 20, 1979	Anne R. Taylor
55-466,938,424	December 4, 1979	Ernest K. Pulsifor
55-467,316,467	January 3, 1980 (bears the date January 3, 1979, however)	David Sanders

Any questions concerning this subpoena should be directed to Robert I. Bogin (202/523-4000), the attorney assigned to this matter.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand on 30th day of August, 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: AUGUST 20, 1980

SUBJECT: MUR 1158: SUBPOENA

Attached is a signed and sealed subpoena in the matter of MUR 1158

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1158
Citizens for LaRouche, et al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 19, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1158:

1. Authorize issuance of the subpoena to American Express/New York as attached to the General Counsel's August 12, 1980 memorandum.

2. Authorize the General Counsel to send the cover letter, as attached to the above-named memorandum, to Ms. Hyacinth Bloomfield, Esq., Office of General Counsel, American Express.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche voted affirmatively for the actions.

Attest:

8-19-80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 8-12-80, 11:25
Circulated on a tally vote basis: 8-12-80, 4:00

August 12, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Pleasehhave the attached Memo distributed to the Commission on a 48 hour tally basis. Thank you.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 AUG 12 AM 9:25

August 12, 1980

MEMORANDUM

TO; The Commission

FROM: Charles N. Steele
General Counsel

RE: Authorization to Issue Subpoena Duces Tecum in Connection with MUR 1158(80)

Attached for Commission approval is a subpoena duces tecum directed to American Express in New York to obtain the original money orders issuing from the Medical Arts Pharmacy in Baltimore, Maryland to Charles Clark, Edward St. John, Rustom Ghandi, Anne R. Taylor, Ernest K. Pulsifor, and David Sanders to facilitate handwriting comparisons between respondent and the above named individuals.

The original money orders sought by the subpoena will assist us in determining whether violation of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) have occurred in this matter.

Recommendation

1. Authorize the attached subpoena to American Express/New York.

2. Authorize the General Counsel to send the attached cover letter to Ms. Hyacinth Bloomfield, Esq., Office of General Counsel, American Express.

Attachments

1. Authorization Form
2. Subpoena with cover letter

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Hyacinth Bloomfield, Esq.
Office of General Counsel
American Express Corp.
American Express Plaza
125 Broad Street
New York, N.Y. 10004

RE: MUR 1158

Dear Ms. Bloomfield:

The Federal Election Commission has issued the attached subpoena and order which requires American Express to provide original money orders issued to certain named individuals.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENA

The Commission hereby authorizes the issuance of a subpoena duces tecum to American Express Corp., American Express Plaza, 125 Broad Street, New York, New York 10004, in connection with MUR 1158.

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

August 21, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MURs 1158, 1186, 1202, 1253, A-774

Please have the attached Errata distributed to the Commission on an informational basis. Thank you.

Emmons

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 AUG 21 P12: 47

August 21, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Errata - MURs 1158, 1186, 1202, 1253, A-774

For your information, the following names were misspelled in the General Counsel's memorandum dated August 5, 1980 for the above-captioned matter:

Ronald Bettag
John Brown
Gerald Pechenuk
Sander Peretz Fredman
Mathew Guice
Shari Waffle
Khushro Ghandi
Therese Seiler

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Victoria A. Lacy
4823 North Lawndale
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Lacy:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

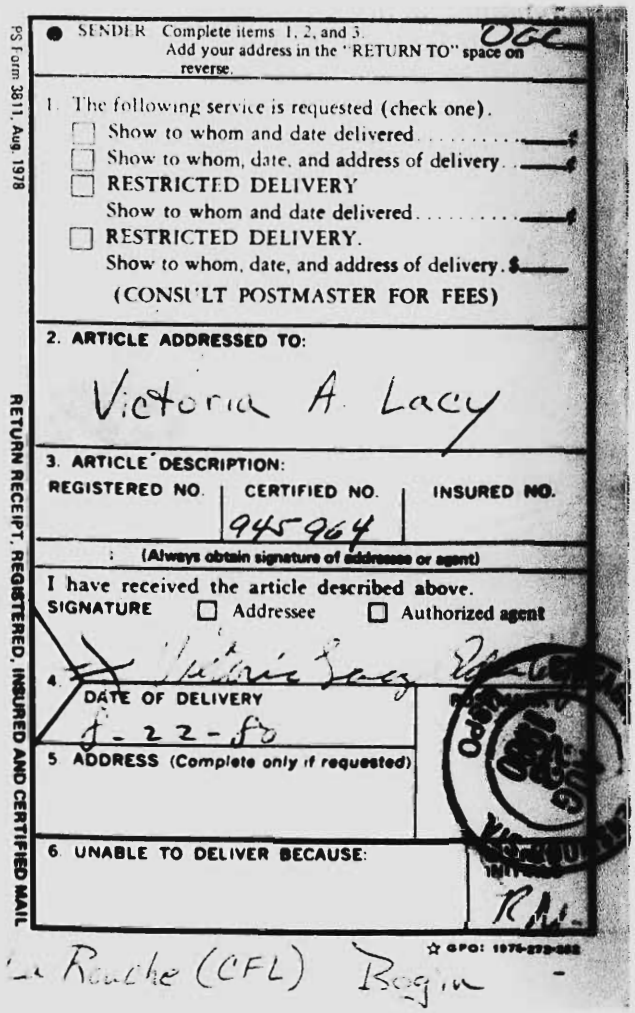
If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered. . . . . ¢
- ☐ Show to whom, date, and address of delivery. . ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered. . . . . ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Victoria A. Lacy

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945964	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. [signature] Victoria Lacy
DATE OF DELIVERY
8-22-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆ GPO: 1976-272-865

La Rouche (CFL) Boston

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Victoria A. Lacy
4823 North Lawndale
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Lacy:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/85

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Victoria A. Lacy
4823 North Lawndale
Chicago, Ill. 60618

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg 219 S. Dearborn St. Chicago, IL 60604, at 11 a.m./~~p.m.~~ on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Klenetsky:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Klenetsky:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
3/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg 219 S. Dearborn St. Chicago IL 60604, at noon ~~a.m./p.m.~~ on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese M. Seiler
5637 N. Glenwood
Chicago, Ill. 60660 -

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Seiler:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese M. Seiler
5637 N. Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Seiler:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Therese M. Seiler
5637 N. Glenwood
Chicago, Ill. 60660

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg 219 S. Dearborn St. Chicago, IL 60604, at 2:30 ~~a.m.~~/p.m. on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Janice Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Hart:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

LaLouche (CFL) Bayside

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
☑ Show to whom and date delivered..... 45¢
☐ Show to whom, date and address of delivery.... ¢
☐ RESTRICTED DELIVERY
Show to whom and date delivered..... ¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.$
(CONSULT POSTMASTER FOR FEES) H1

2. ARTICLE ADDRESSED TO:
Janice Hart

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945777	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
R. Hart

4. DATE OF DELIVERY 8-19-80

5. ADDRESS (Complete only if requested)
RECEIVED

6. UNABLE TO DELIVER BECAUSE:

POSTMARK AUG 19 1980

1158, 1186, 1202, 1253 ☆GPO : 1979-289-848

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Janice Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Hart:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Janice Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 3:30 ~~a.m.~~/p.m. on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618 -

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Hart:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

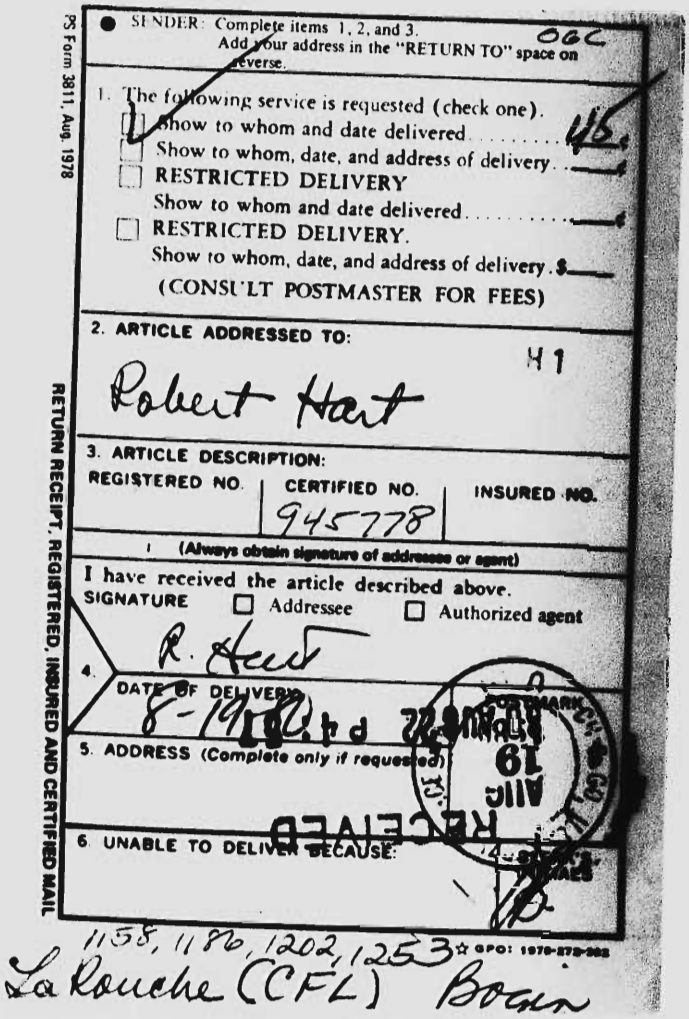
Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

2371501



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse. OGC

1. The following service is requested (check one).
- ☐ Show to whom and date delivered 45
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery ..... $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: 41
Robert Hart

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945778	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
R. Hart

4. DATE OF DELIVERY
8-19-82

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
AUG 19
RECEIVED

☆ GPO: 1979-279-395

1158, 1186, 1202, 1253
LaRouche (CFL) Bogus

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Hart:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
5/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Robert Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 9:30 a.m./p.m. on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Waffle:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

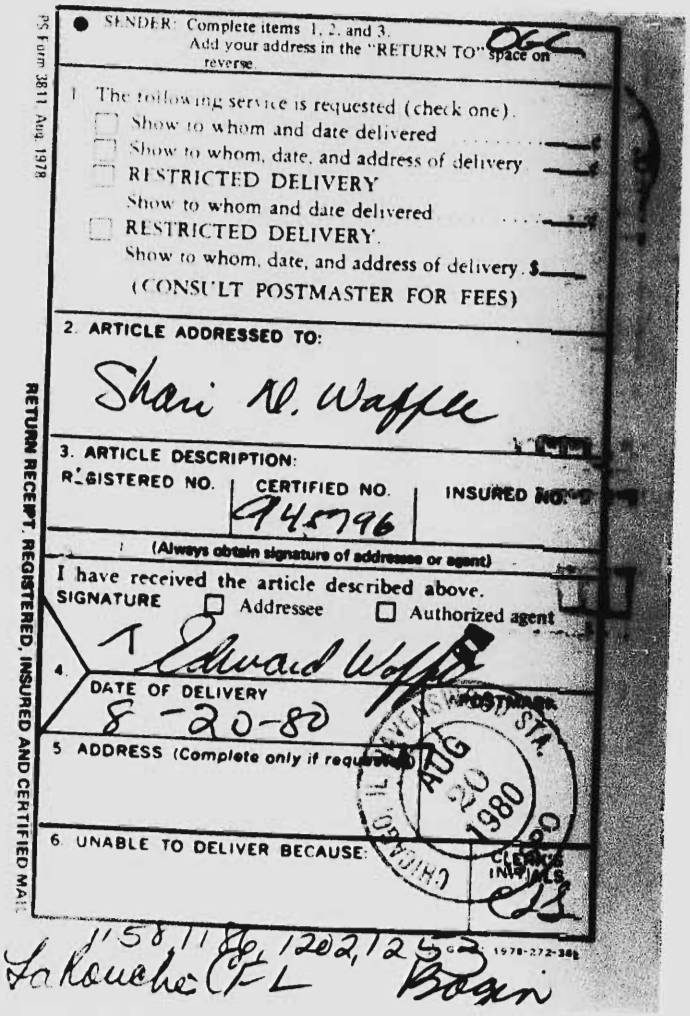
If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered
- ☐ Show to whom, date, and address of delivery
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Shari N. Waffle

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 945796 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Edward Waffle

4. DATE OF DELIVERY
8-20-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK
CHICAGO ILL. STA. C
AUG 20 1980

1978-272-384

158, 118, 120, 125
Lakeuche Ct L
Bozzi

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Ms. Waffle:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago IL 60604, at 9 a.m./~~p.m.~~ on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert E. Pierce
4728 North Albany
Chicago, Ill. 60625

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Pierce:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

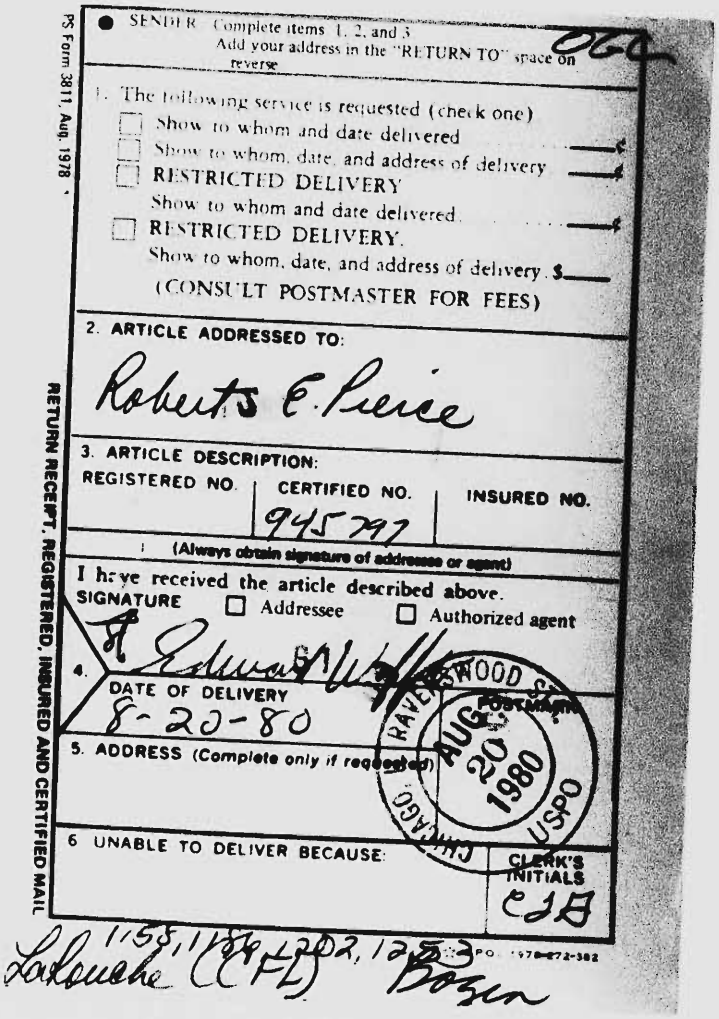
If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

OGC

1. The following service is requested (check one)
- ☐ Show to whom and date delivered ____¢
- ☐ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Roberts E. Pierce

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945797	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
4. [signature]

DATE OF DELIVERY
8-20-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
CJB

RAVENSWOOD STA. POSTMARK CHICAGO AUG 20 1980 USPO

GPO: 1978-272-382

1-58, 1-59, 202, 1-55 Boozer
Lafourche (CC-L)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert E. Pierce
4728 North Albany
Chicago, Ill. 60625

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Pierce:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Robert F. Pierce
4728 North Albany
Chicago, Ill. 60625

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 10 a.m./~~p.m.~~ on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Lerch
144 Delaplain
Riverside, Ill. 60546

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Lerch:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

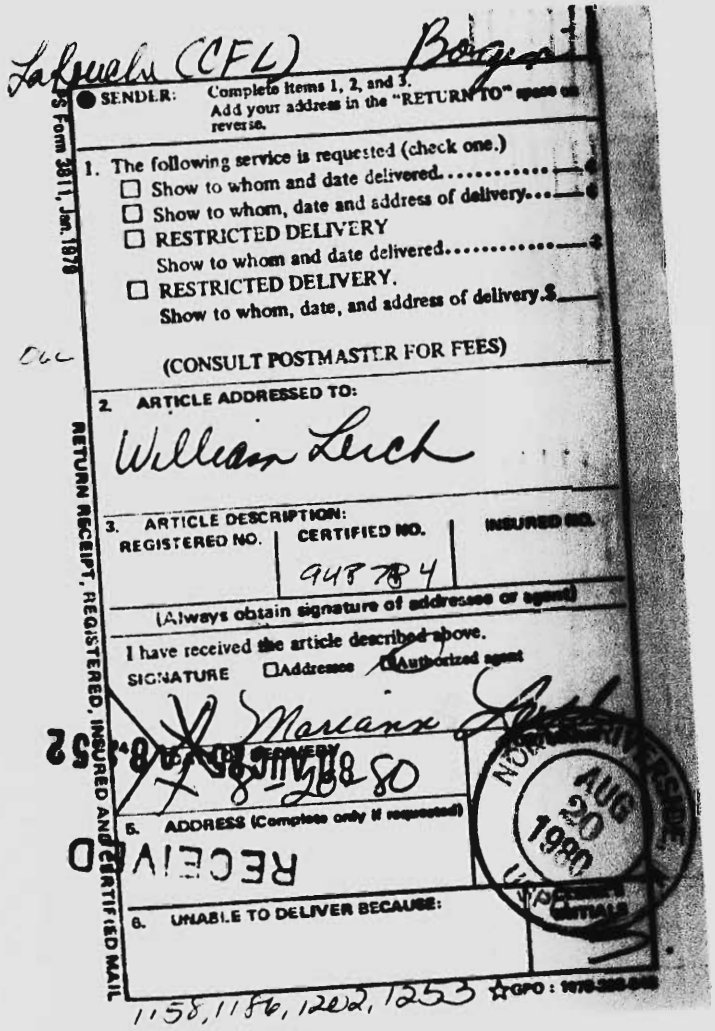
If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



Lakewood (CFL) Bayou

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date and address of delivery....¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
William Leach

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 948784 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☒Authorized agent
Marianne Leach

DATE OF DELIVERY 8-20-80

5. ADDRESS (Complete only if requested)
RECEIVED

6. UNABLE TO DELIVER BECAUSE:

AUG 20 1980

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1158, 1186, 1202, 1253 ☆GPO : 1979-289-848

CLC

52

3 3 3 0 7 1 5 1 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Lerch
144 Delaplain
Riverside, Ill. 60546

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Lerch:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: William Lerch
144 Delaplain
Riverside, Ill. 60546

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 11 a.m./~~p.m.~~ on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John H. Brown, Jr.
5815 North Wayne, Apt. 2
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Brown:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

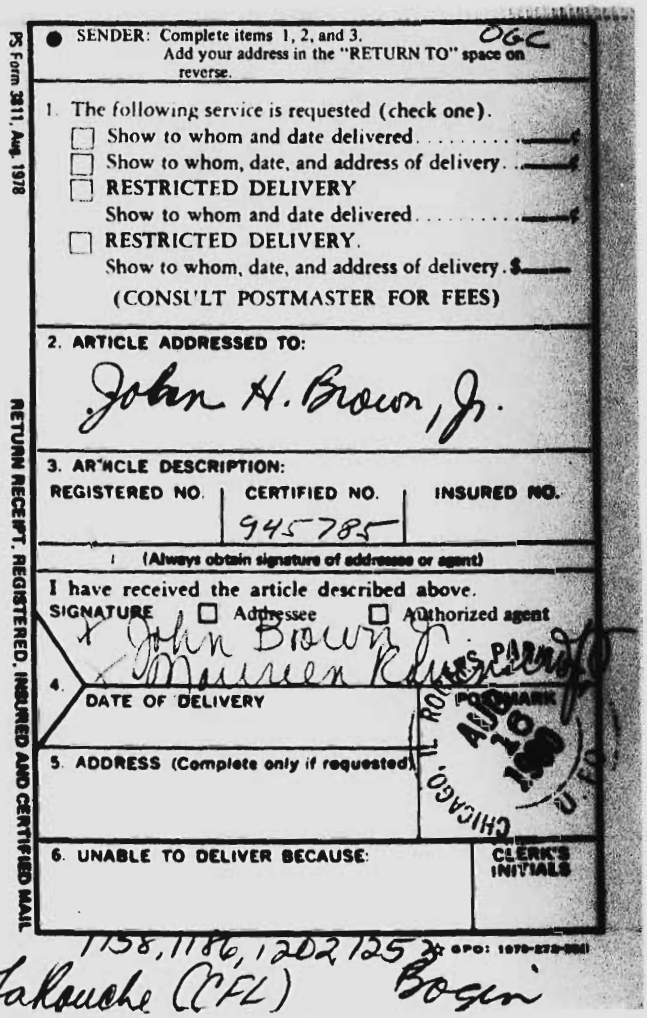
If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

OGC

1. The following service is requested (check one).
- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date, and address of delivery.....¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

John H. Brown, Jr.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945785	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X John Brown Jr.

X Maureen Brown

4. DATE OF DELIVERY

POSTMARK

AUG 10 1978

CHICAGO, ILL.

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1978-272-865

1138, 1186, 1202, 1253

Takeuchi (CFL) Bogen

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John H. Brown, Jr.
5815 North Wayne, Apt. 2
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Brown:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB 8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: John H. Brown, Jr.
5815 North Wayne, Apt. 2
Chicago, Ill. 60660

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at noon ~~a.m./p.m.~~ on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Ashley:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Ashley:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RG
8/8/80

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St Chicago, IL. 60604, at 2:30 ~~a.m.~~/p.m. on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sander Peretz Fredman
1103 West Grace
Chicago, Ill. 60613

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Fredman:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

2 1 5 7 3 0 3 0 2 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sander Peretz Fredman
1103 West Grace
Chicago, Ill. 60613

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Fredman:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Sander Peretz Fredman
1103 West Grace
Chicago, Ill. 60613

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 3:30 ~~a.m.~~/p.m. on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mitchell F. Hirsch
1103 West Grace
Chicago, Ill. 60613

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Hirsch:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mitchell F. Hirsch
1103 West Grace
Chicago, Ill. 60613

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Hirsch:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

RB
8/8/80

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Mitchell F. Hirsch
1103 West Grace
Chicago, Ill. 60613

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 4:30 ~~a.m.~~/p.m. on August 26, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Greenberg
5637 N. Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Greenberg:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Greenberg
5637 N. Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Greenberg:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/8/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Paul Greenberg
5637 N. Glenwood
Chicago, Ill. 60660

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 9 a.m./~~p.m.~~ on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Eisenberg:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: Matching Fund Submission
of Citizens for LaRouche

Dear Mr. Eisenberg:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

RB
8/5/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500 Dirksen Federal Bldg. 219 S. Dearborn St. Chicago, IL 60604, at 10 a.m./~~p.m.~~ on August 27, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. § 9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 8th day of August 1980.

John W. McGarry

John W. McGarry, Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

August 5, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MURs 1158,1186,1202, 1253
A 774

Please have the attached sensitive memo distributed to the Commission on a 48 hour tally basis. Thank you.

Please return the original to this office.

0037153

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MURs 1158, 1186,
	)	1202, 1253
	)	A-774
Citizens for LaRouche et al.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 7, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding the above-captioned matters:

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.

2. 100% review by the Audit Division of the following five threshold states:

   Maryland
   Virginia
   Ohio
   Oregon
   Missouri

3. Authorize the taking of the following depositions:

Paul Greenberg	Ronald Bettog
Theresa Seiler	John Braur
Robert Hart	Mitchell Hirsch
Janice Hart	Gerald Pecheuik
Joyce Rubinstein	Kirby Ashley
William Lerch	Sander Perety Friedman
Melvin Klenetsky	Matthew Gruice

(Continued)

3 3 7 4 0 3 7 1 5 3 7

3. (Continued)

Robert Pierce	Denise Ham
Victoria Lacy	Linda Fisch
Elliot Eisenberg	Jennifer Roe
Shaw Waffle	Khaxbro Ghandhi
Roger Ham	

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8/7/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 8-5-80, 10:00
Circulated on 48 hour vote basis: 8-5-80, 4:00

0 3 7 0 4 0 5 7 1 5 3 9

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 AUG 5 A10: 00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Report on Various Matters Concerning Citizens for LaRouche (including request for authorization to issue subpoenas for deposition); RE: A-774 and MURs 1158, 1186, 1202 and 1253.

0 2 0 0 3 7 1 5 3 2

In a memorandum dated April 23, 1980, the Office of General Counsel presented a status report of the various investigations concerning Citizens for LaRouche (CFL), the principal campaign committee of Lyndon H. LaRouche, Jr. As is more fully discussed below, an expanded review of CFL is now warranted.

New Developments

In MUR 1158 the Commission found reason to believe that an individual representing CFL may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by falsifying contributor information and documentation submitted to the Commission for matching and by contributing money in the name of another. In its investigation, this Office has evidence which indicates that representatives of CFL did indeed falsify contributor information and documentation by submitting written instruments for matching fund payments attributable to individuals who assert that they have not made contributions to Lyndon LaRouche or who have made contributions in cash.

In another matter referred to this office by the Audit Division (audit referral of June 16, 1980), there exists a factual pattern involving money orders that bears a striking resemblence to this situation which appears to exist in MUR 1158.

In its review of CFL's books and records pursuant to 26 U.S.C. § 9038, the audit division uncovered matters which it referred to the Office of General Counsel. 1/ Finding C of the Audit Report

---

1/ Findings A and B of the Audit relating to receipt of excessive contributions and unqualified campaign expenses will be addressed in a General Counsel's Report.

(attached) presents a factual pattern strikingly similar to the one addressed by the Commission in MUR 1158, in that a review of money orders and cashier's checks contributed to CFL disclosed several irregularities. A discussion of the irregularities is supplemented by Exhibits C, D, E, F, G, H, and I, (attached) which provide further detail on these receipts.

The initial pattern noted during the review of photocopies of contribution instruments was the large number of money orders issued from two (2) Chicago banking entities which were deposited in the New York headquarters account between December 10th and 17th. An examination of the serial numbers and dates of purchase associated with these money orders revealed that many instruments were consecutively numbered and purchased on or about the same date (See Exhibit C). Additional money orders with serial number patterns or linkage to the December deposits were also noted. A total of 31 money orders received from 23 contributors were examined during this review. The auditors ascertained that 21 of the 23 contributors of money orders were listed as "unemployed."

1. Money Orders Purchased From Illinois Banking Institutions

The most significant facts in the pertinent part of the Audit referral pertaining to Chicago are:

a) the similarity of handwriting on the payee lines of most of the instruments; and,

b) signature irregularities in the instruments submitted by CFL which bear the purported signatures of:

i. Janice Hart (Exhibit D, Nos. 1 and 7; and Exhibit E);

ii. Robert Hart (Exhibit D, No. 21; compare to Exhibit D, No. 1);

iii. William Lerch (Exhibit D, Nos. 2 and 15);

iv. Melvin Klenetsky (Exhibit D, Nos. 3 and 13);

v. Victoria Lacy (Exhibit H; and Exhibit D, Nos. 5 and 9);

vi. Paul Greenberg (Exhibit D, No. 6; and Exhibit I, both compared to Exhibit D, No. 21); and,

vii. Elliot R. Eisenberg (Exhibit D, Nos. 6 and 8; compared to exhibits of Paul Greenberg, supra). 2/

Recognizing that handwriting differences can be determined authoritatively only by experts within the field of handwriting analysis, it still appears that the purported signatures of the above-mentioned individuals are so different that there is reason to doubt that they were signed by the same person.

A review was also conducted by the Audit Division to determine if any of the questionable money orders were matched. The results of the review indicated that 23 instruments were submitted by the Committee for matching. 3/

2. Money Orders Purchased From New York Banking Institutions

a) Chase Manhattan Bank - The handwriting style of the date and payee lines in all four (4) instruments bear several common traits and appear to have been completed by the same hand (See Exhibit F). This irregularity is similar to the discussion under 1, except the style of handwriting is that of a different hand. The unique characteristics associated with this handwriting style are:

(1) The "D" in the December is written in the same open distinctive style.

(2) The use of the number "7" in 79 with a bar, sometimes referred to as a European 7.

(3) On the payee line, the "t" and "z" in Citizens and the "F" in For are written with bars across each letter.

Other characteristics may be developed but those discussed are readily apparent to the untrained eye and appear on all four (4) instruments.

2/ For a detailed, albeit lay, analysis of the handwriting irregularities for the above-mentioned person, et al., see the attached Audit report.

3/ The money orders possessed several of the characteristics which were determined to be probative in MUR 1158, which dealt with the third CFL submission from Maryland.

b) The Bank of New York - Three (3) contributors made contributions by money orders drawn on the above bank (see Exhibit G). There does not appear to be any common characteristics in the handwriting styles when comparing the three (3) money orders; however, the Audit staff has noted the following:

(1) The money orders are consecutively numbered (WE 305 180-181-182);

(2) The money orders are dated December 11, 1979;

(3) The money orders are for $200; and,

(4) "Buffalo" is written on the lower left corner of each money order.

Furthermore, money order #WE 305-181 which bears the signature -Joyce H. Rubinstein - has the same common characteristics as the four (4) Chase Manhattan Bank money orders described in Section 2a, which are also from contributors living in the Buffalo area. Committee records indicate that Joyce H. Rubinstein is a CFL representative.

In sum, there is a suspect sameness in some documents, and, conversely, a suspect difference in handwritings which should be the same. In addition, the fact of sequential numbering of some of the money orders is suspicious. At this time, the persons responsible for the above described irregularities is difficult to ascertain. For this reason, we are recommending that an investigation of these matters be conducted by this office pursuant to 26 U.S.C. § 9039. To initiate the investigation we are seeking authorization from the Commission to take the depositions of the 23 individuals involved. The results of the investigation may point to violations of 26 U.S.C. § 9042(c) and 2 U.S.C. § 441f.

In MUR 1186 the Commission's investigation is being obstructed by CFL's refusal to turn over documents and to be questioned in connection with the facts surrounding the submission of an Oregon money order attributed to Harold M. Harper. Mr. Harper has stated in an affidavit that he never purchased a money order payable to CFL. This situation is almost identical to one of the fact patterns uncovered in MUR 1158.

MUR 1186 developed out of Mr. Harper's response to a letter sent by the Commission seeking confirmation of a money order purportedly signed by Harper payable to CFL. This suspected money order was one of twelve resubmitted by CFL to meet the threshold requirement

in Oregon. Of the twelve confirmation letters sent, this Office has not received a response from six of the individuals. 4/ Thus, this Office recommends that the Commission authorize subpoenas be issued to the six individuals who failed to respond to the confirmation letter.

In addition to the failure of the six individuals to respond to the Commission's letter, this Office has not been unable to verify that two contributors which LaRouche submitted to qualify Ohio as a threshold state are residents of Ohio. The post office has returned the Commission's letters as undeliverable, and a check of the criss-cross directory seems to suggest that no one by the name of any of these contributors lives at the reported address. This Office will continue its investigation to determine the residency of these two purported Ohio contributors.

In MUR 1202 which involved a finding of reason to believe that an individual made a contribution in the name of another, this Office has some information that no violation of the Act has occurred. This Office is awaiting further information before proceeding.

Analysis

At this early stage a pattern is appearing that puts into question many of the money orders and cashier's checks submitted by CFL for matching fund payments. However further investigation and review is necessary in order to ultimately demonstrate that CFL has not met the required criteria to establish eligibility for matching fund payments and to support a repayment determination pursuant to 26 U.S.C. § 9038(b)(1). This section states:

> If the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034, it shall notify the candidate, and the candidate shall pay to the Secretary an amount equal to the amount of the excess payments.

4/ See Memorandum, Analysis of Threshold Submission for Lyndon A. LaRouche, Jr. These twelve money orders were brought into question when they were resubmitted signed on a Monday after being rejected on the preceding Friday for not containing the requisite signatures.

If the Commission established evidence of fraudulent contributions in the threshold submission which were necessary to establish LaRouche's eligibility to receive matching fund payments, the Commission could sustain a repayment of the entire amount certified. Moreover, this Office is conducting further research to determine whether the Commission could sustain a repayment of the entire amount of matching funds certified if there was evidence of fraud in contributions which were not necessary to establish eligibility, (e.g. fraud appearing in subsequent submissions). The Commission may also assess civil penalties where appropriate, including penalties pursuant to 26 U.S.C. § 9042.

Proposed Action

The Commission has broad powers to conduct investigations which it determines to be necessary to carry out its responsibilities under the Presidential Primary Matching Payment Account Act. Committee to Elect Lyndon LaRouche v. Federal Election Commission, 613 F.2d 834, 843 n. 16 (D.C. Cir. 1979). Specifically, the Office of General Counsel recommends the Commission authorize the following actions:

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.

2. 100% review by the Audit Division of the following five threshold states: Maryland, Virginia, Ohio Oregon and Missouri. 5/

5/ According to the Audit Division a 100% review would include:

1. review of all written instruments and associated documentation presented, including various "sorts": dates, serial numbers, issuing institution, amounts etc.;

2. review of all contributor list items including various "sorts": name, address, date, amount occupation, principal place of business;

3. interface with information gained in the fieldwork phases of the audit;

4. interface with information gained during the various MUR actions;

3. Authorize the taking of the following depositions:

Paul Greenberg	Ronald Bettog
Theresa Seiler	John Braur
Robert Hart	Mitchell Hirsch
Janice Hart	Gerald Pecheuik
Joyce Rubinstein	Kirby Ashley
William Lerch	Sander Perety Friedman
Melvin Klenetsky	Matthew Gruice
Robert Pierce	Denise Ham
Victoria Lacy	Linda Fisch
Elliot Eisenberg	Jennifer Roe
Shaw Waffle	Khaxbro Ghandhi
	Roger Ham

It is the opinion of this Office that Commission authorization to proceed with the above-listed actions coupled with the ongoing investigations arising from the confirmation letters and depositions in MURs 1158 and 1186 afford the most productive and efficient use of Commission resources and is designed to provide evidence that Lyndon LaRouche should not have been certified to receive matching fund payments.

An analysis of all cashier's checks and money orders might result in further evidence that contributions submitted for matching were fraudulently produced or improperly attributed to individuals. See MURs 1158 and 1186.

A 100% review of Virginia, Oregon and Missouri is proposed because these three were resubmission states for threshold certification. A 100% review of Maryland is proposed since the violation uncovered in MUR 1158 arises out of Baltimore, Maryland. Ohio is proposed because of the failure to confirm the mailing addresses of two Ohio contributors necessary to qualify Ohio as a threshold State.

5/ Continued

5. review of selected daily deposit batches contained in matching fund submissions;

6. Comparison of selected items to information disclosed on Committee's disclosure reports, for example: loans, contribution refunds made, other adjustments to contributions received; and

7. other procedures arising out of patterns established during review of items one through six.

Recommendations

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.

2. 100% review by the Audit Division of the following five threshold states: Maryland, Virginia, Ohio Oregon and Missouri.

3. Authorize the taking of the following depositions:

Paul Greenberg	Ronald Bettog
Theresa Seiler	John Braur
Robert Hart	Mitchell Hirsch
Janice Hart	Gerald Pecheuik
Joyce Rubinstein	Kirby Ashley
William Lerch	Sander Perety Friedman
Melvin Klenetsky	Matthew Gruice
Robert Pierce	Denise Ham
Victoria Lacy	Linda Fisch
Elliot Eisenberg	Jennifer Roe
Shaw Waffle	Khaxbro Ghandhi
	Roger Ham

Attachments

Audit Finding C
Attachments C - I
Authorization
Sample subpoena and letter

3 0 4 0 2 7 1 5 4 5

C. Receipt Irregularities

One phase of our review of Committee receipts involved an examination of photocopies of contribution instruments (i.e. receipts for cash contributions, checks, money orders) for selected Committee deposits. During this process, several apparent irregularities surfaced in the December 1979 deposits. A discussion of the irregularities is supplemented by Exhibits C, D, E, F, G, H, and I which provide further detail on these receipts.

Footnote 3/ continued from page 8.

Research assistant, Medical College of Virginia; programmer, Computron; employee, E.W. Finley, P.C.; electrician, Singer Company; technician, Astronautics; banking consultant, American Banking Association; salesman, Sewing Exchange; clerk, Team Temps; housewife, husband unemployed; four (4) unidentified in records and reports; one (1) self employed; and one (1) unemployed person.

The initial pattern noted during the review of photocopies of contribution instruments was the large number of money orders issued from two (2) Chicago banking entities which were deposited in the New York headquarters account between December 10th and 17th. An examination of the serial numbers and dates of purchase associated with these money orders revealed that many instruments were consecutively-numbered and purchased on or about the same date (See Exhibit C). Additional money orders with serial number patterns or linkage to the December deposits were also noted. A total of 31 money orders received from 23 contributors were examined during this review.

At this juncture, we reviewed the Committee's 1979 listing of contributions and determined that:

(a) 21 of the 23 contributors making the 31 contributions by money order were listed as "unemployed";

(b) the individuals, listed as unemployed, made contributions by money order ranging in value from $50.00 to $250.00;

(c) the total value of the 29 contributions from the 21 unemployed persons was $4,425.00; and,

(d) one (1) of the individuals making contributions by money orders is listed in Committee records as a Committee representative and three (3) others are listed as campaign coordinators.

We then conducted a close examination of photocopies of money order contributions and several additional irregularities were apparent:

1. Money Orders Purchased From Illinois Banking Entities

The style of handwriting which completed the date and payee lines of 20 of the 24 instruments is extraordinarily similar to such an extent that it may have been written by the same hand. Several common characteristics of handwriting style appear on the money orders which distinguish them from the other instruments. The most prevelant characteristics are:

(a) The "Ci" in Citizens in 17 instances is detached from the "t";

(b) The "t" in Citizens in 14 instances is written as "  ";

(c) The "s" in Citizens in approximately 17 instances is detached from the connected "en";

(d) The "7" in 79 is generally tilted to the right and almost touches the "9";

(e) The "f" in for is written in a distinctive style lower-case writing; and,

(f) For 15 of the 24 money orders a date line is not provided. In all 15 cases the date is rubber stamped on the money order and 12 of the 15 rubber stamped dates appear to be made from the same stamp.

Other characteristics may be developed in a more detailed comparison but those discussed above are readily apparent to the untrained eye and in some combination, appear on all 24 instruments (See Exhibit D, Instruments 1-24).

Although the identity of the person(s) who actually completed date and payee lines of the instruments is uncertain, our review of signatures appearing on the money orders revealed the characteristically distinctive "t" in an instrument signed in the name of Janice Hart (See Exhibit D, Instrument 1). We can not state with any degree of certainty that Janice Hart signed the instrument because one (1) other money order (See Exhibit D, Instrument 7) and three (3) contributions by personal check (See Exhibit E) bear the signature -Janice Hart- in a different style of handwriting. There appears to be a connection between Janice Hart or the person signing the money order in Janice Hart's name and the other 18 money orders. However, the three (3) personal checks (Exhibit E) bearing the signature Janice Hart are drawn on the joint account of Robert Hart and Janice Hart. Furthermore, the same characteristics in the signature of Janice Hart (specifically HART) on the three (3) personal checks appear to be similar with a money order that bears the signature of Robert Hart (Exhibit D, Instrument 21). The common characteristics apparent to the untrained eye in all four (4) instruments are:

(a) the "H" in Hart appears to be written as 

(b) The "r" in Hart is slanted and somewhat pointed

(c) the "t" in Hart is written a  .

In addition, Committee records indicate that Robert Hart is a campaign coordinator.

2. Money Orders Purchased From New York Banking Entities

a) Chase Manhattan Bank - The handwriting style of the date and payee lines in all four (4) instruments bear several common traits and appear to have been completed by the same hand (See Exhibit F). This irregularity is similar to the discussion under 1, except the style of handwriting is that of a different hand. The unique characteristics associated with this handwriting style are:

(1) The "D" in the December is written in the same open distinctive style.

(2) The use of the number "7" in 79 with a bar, sometimes referred to as a European 7.

(3) On the payee line, the "t" and "z" in Citizens and the "F" in For are written with bars across each letter.

Other characteristics may be developed but those discussed are readily apparent to the untrained eye and appear on all four (4) instruments.

b) The Bank of New York - Three (3) contributors made contributions by money orders drawn on the above bank (see Exhibit G). There does not appear to be any common characteristics in the handwriting styles when comparing the three (3) money orders; however, we have noted the following:

(1) The money orders are consecutively numbered (WE 305 180-181-182);

(2) The money orders are dated December 11, 1979;

(3) The money orders are for $200; and,

(4) "Buffalo" is written on the lower left corner of each money order.

Furthermore, money order # WE 305-181 which bears the signature - Joyce H. Rubinstein - has the same common characteristics as the four (4) Chase Manhattan Bank money orders described in Section 2a, which are also from contributors living in the Buffalo area. Committee records indicate that Joyce H. Rubinstein is a CFL representative.

3. Signature Irregularities

Another irregularity observed in the instruments involved signature discrepancies appearing on the the money orders. Contributor signatures were examined on the 31 money orders, in conjunction with signatures of other contribution instruments attributed to the contributor. The examination revealed a distinctive variation of handwriting style in contributions from the following persons:

(a) Janice Hart - See Exhibit D, Instruments 1, 7, and also Exhibit E. Previously discussed in Section A;

(b) William Lerch - See Exhibit D, Instruments 2 and 15. The signatures on the two (2) contribution instruments are significantly different (presumed to be one in the same individual since the Committee submitted both instruments for matching as being contributed by William Lerch;

(c) Melvin Klenetsky - See Exhibit D, Instruments 3 and 13. The signatures on the two (2) instruments are significantly different. Additionally, the payee lines appear to be written by different hands;

(d) Victoria A. Lacy - The two (2) money orders (Exhibit D, Instruments 5, 9) appear to be written by the same hand, signature included, but significantly different from the handwriting on another money order and personal check bearing the signature Victoria A. Lacy (Exhibit H); and,

(e) Paul Greenberg - The payee lines on both money orders appear to be written by the same hand, however, the two (2) signatures appear to be different (See Exhibit D, Instruments 6 and 20). Furthermore, the signature and CFL endorsement on the reverse side of a State refund check are significantly different from the previously mentioned money orders (Exhibit I).

The variation in signatures appearing on these instruments exists to such a degree that they would appear to have been written with the stroke of a different hand.

Another separate but related discrepancy was noticed in connection with the signature review. The signature and address for the money order signed in the name Paul Greenberg (See (e) above) also bears a strong similarity to the style of handwriting appearing on an instrument signed in the name Elliot R. Eisenburg (See Exhibit D, Instruments 6 and 8).

The results of the review discussed above led the Audit staff to examine contributor addresses for common patterns of residence. It was determined that 10 of the 16 individuals associated with irregular money orders issued from Chicago banking entities (See Exhibit C) resided at two (2) groups of related addresses. 4/ Further, all 10 of the individuals are listed as contributors on money orders bearing similarities of handwriting style discussed in Section A, and may be connected to the Janice Hart signature irregularities.

A review was also conducted to determine if any of the money orders were matched. The results of the review indicated that 23 instruments were submitted by the Committee for matching.

Recommendation

The Audit staff recommends that this matter be referred to the Office of General Counsel for possible MUR treatment. 5/

4/ A "related address" is a term used to describe a group of people linked either directly or indirectly by residential addresses. The link between individuals may be established directly, such as when several unrelated individuals appear to share the same address, or indirectly, such as when an individual sharing an address with another, moves to a different address shared with a different individual. A persistent link (cited here) between ten (10) individuals, linking two (2) different groups, is the handwriting identified to money orders bearing the similarities discussed in Section A and may be connected to Janice Hart signature irregularities.

5/ This matter is similar to item B in our memorandum referred to your office on February 6, 1980. In that case, the money orders possessed several of the characteristics mentioned above.

EXHIBIT C

List of Money Orders/Contributors

Exhibit C Reference #	Name of Contributor/Occupation and Bank		Address Group #*	Date of Issuance	Date of Deposit	Amount	Money Order #	Comment
	[illegible] TRUST & SAVINGS BANK (Chicago, IL)							
1	Janice Hart	unemployed		12-07-79	12-10-79	$125.00	261907	
2	Fillian Lerch	unemployed		12-07-79	12-10-79	55.00	261908	Also see #15
3	Melvin Flenetsky	unemployed	I	12-07-79	12-10-79	125.00	261909	Also see #13
4	Robert Pierce	unemployed	I	11-23-79	11-27-79	100.00	262247	
5	Victoria A. Lacy	unemployed	I	12-10-79	12-11-79	100.00	262375	
6	Paul Greenberg	unemployed	II	12-04-79	12-07-79	100.00	262394	Also see #20, listed as campaign coordinator per reports
7	Janice Hart	unemployed		12-04-79	12-07-79	120.00	262395	
8	Elliot R. Lisenberg	unemployed	II	12-10-79	12-11-79	200.00	262826	
9	Victoria A. Lacy	unemployed	I	12-10-79	12-11-79	50.00	262827	
	[illegible] BANK (Chicago, IL)							
10	Shari Waffle	unemployed	I	12-07-79	12-11-79	135.00	1567276	
11	Shari Waffle	unemployed	I	12-07-79	12-11-79	65.00	1567277	
12	Shari Waffle	unemployed	I	12-07-79	12-11-79	50.00	1567278	
13	Melvin Flenetsky	unemployed	I	12-10-79	12-11-79	150.00	1567376	Also see #3
14	Theresa Seiler	unemployed	II	12-10-79	12-11-79	250.00	1567377	Listed as Camp. Coordinator per reports

Exhibit C

Exhibit C

Exhibit # Reference #	No. of Contributor, Occupation and Date		Address Group #*	Date of Issuance	Date of Deposit	Amount	Money Order #	Comment
	[redacted] (Chicago, IL) continued							
15	[redacted]	unemployed		11-19-79	11-21-79	200.00	1571440	Also see #2
16	[redacted]	unemployed		12-13-79	12-17-79	180.00	1577339	
17	John H. Brown	unemployed		12-13-79	12-17-79	120.00	1577340	
18	Mitchell P. Hirsch	unemployed	I	12-13-79	12-17-79	200.00	1579354	Also see #23
19	Gerald Pechanec	unemployed		12-13-79	12-17-79	150.00	1579355	
20	Paul Greenberg	unemployed	II	12-10-79	12-11-79	100.00	1580551	Also see #6
21	Robert Hart	unemployed		12-10-79	12-11-79	250.00	1580552	Listed as Camp. Coordinator per reports
	[redacted] (Chicago, IL)							
22	[redacted]	unemployed	II	12-11-79	12-13-79	250.00	128585	
23	[redacted]	unemployed	I	12-11-79	12-13-79	250.00	347127	Also see #18
24	[redacted]	unemployed	I	12-11-79	12-13-79	250.00	K71647	

Exhibit C

Exhibit F Reference #	Name of Contributor/Occupation and Bank	Address Group #*	Date of Issuance	Date of Deposit	Amount	Money Order #	Comment
	CHASE MANHATTAN BANK (New York, NY)						
1	Kathryn C. Price unemployed		12-21-79	12-26-79	$ 100.00	89164099	
2	Denise Barr		12-21-79	12-26-79	100.00	89164107	
3	Linda Finch unemployed		12-21-79	12-26-79	100.00	89164115	
4	Jennifer Poe		12-21-79	12-26-79	100.00	89164123	
Exhibit G	THE BANK OF NEW YORK (New York, NY)						
1	Krishna Ghandhi unemployed		12-11-79	12-12-79	$200.00	WE305180	
2	Joyce H. Rabinstein unemployed		12-11-79	12-12-79	200.00	WE305181	Listed as Cmte. Rep.per record
3	Roger Ham unemployed		12-11-79	12-12-79	200.00	WE305182	
				TOTAL	$4,625.00		

* Address Group - See Exhibit B for an explanation of address group.

Exhibit D

(1) N.S.

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

No 261907

CHICAGO, ILLINOIS, Dec 7 19 77

PAY TO THE ORDER OF Citizens for LaRoche

ATTORNEY'S FEE $125.00 Twelve Hundred

DO NOT WRITE BELOW THIS LINE 2811 W Cullom, Chicago IL

(2)

Amalgamated Trust & Savings Bank

2-340 710

CHICAGO, ILLINOIS 60603

No 261908

CHICAGO, ILLINOIS, Dec 7 19 77

PAY TO THE ORDER OF Citizens for LaRoche

ATTORNEY'S FEE $125.00 One Hundred Twenty Five

DO NOT WRITE BELOW THIS LINE

(3)

Amalgamated Trust & Savings Bank

2-340 710

CHICAGO, ILLINOIS 60603

No 261909

CHICAGO, ILLINOIS, Dec 7 19 77

PAY TO THE ORDER OF Citizens for LaRoche

ATTORNEY'S FEE $125.00 One Hundred Twenty Five

DO NOT WRITE BELOW THIS LINE 2811 W Cullom, Chicago IL

Exhibit D

(4)

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

No. 2622

CHICAGO, ILLINOIS, Dec 2-3 19 77

PAY TO THE ORDER OF Citizens for LaRouche

A.T.&S.B. $100.00 100 cts Rich C Pac

NOT GOOD FOR MORE THAN $100.00

SIGNATURE

ADDRESS

⑈ 2622 ⑆ 0710034054 ⑈ 0000730 80⑈ 49

(5)

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

2340
710

No. 2375

CHICAGO, ILLINOIS, Dec 10 19 77

PAY TO THE ORDER OF Citizens for LaRouche

A.T.&S.B. $100.00 100 cts Victoria Q. [illegible]

NOT GOOD FOR MORE THAN $100.00

SIGNATURE

ADDRESS

⑈ 2375 ⑆ 0710034054 ⑈ 0000730 80⑈ 49

(6)

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

2340
710

12707

No. 20239

CHICAGO, ILLINOIS, Dec 20 19 77

PAY TO THE ORDER OF Citizens for LaRouche

A.T.&S.B. $200.00 200 cts [illegible]

NOT GOOD FOR MORE THAN $200.00

SIGNATURE

ADDRESS

⑈ 20239 ⑆ 0710034054 ⑈ 0000730 80⑈ 49

Exhibit D

(7)

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

No 2623

CHICAGO, ILLINOIS, 19 79

PAY TO THE ORDER OF

NOT GOOD IF PHONE THAT $200.00 OR...

(8) N.S.

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

No 212326

CHICAGO, ILLINOIS, 19 79

PAY TO THE ORDER OF

NOT GOOD FOR MORE THAN $200.00

(9)

Amalgamated Trust & Savings Bank
CHICAGO, ILLINOIS 60603

No 262327

CHICAGO, ILLINOIS, 19 79

PAY TO THE ORDER OF

NOT GOOD FOR MORE THAN $200.00

Exhibit D

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1567276
DEC 7 1979
2-3
710

10

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $135 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE

⑈1567276⑈ ⑆071000039⑆ 14,01,40 16⑈

11

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1567277
DEC 7 1979
2-3
710

N.S

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $35 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE

⑈1567277⑈ ⑆071000039⑆ 14,01,40 16⑈

12

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1567278
DEC 7 1979
2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

N.S

CONTINENTAL BANK $20 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE

Exhibit D

13

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 156737

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $150 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE Mel Klenetsky

⑈156737⑈ ⑆071000013⑆ 11⑈1,10 16⑈

14

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1567377

DEC 19 1979

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $250 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE Terrence P. Lisle

⑈1567377⑈ ⑆071000013⑆ 11⑈1,10 16⑈

15

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1571440

NOV 19 1979

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $250 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

DRAWER'S SIGNATURE

⑈1571440⑈ ⑆071000013⑆ 11⑈1,10 16⑈

Exhibit D

16

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1577339

DEC 13 1979

2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

N.S.

CONTINENTAL BANK — $15 and 00 Cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

Ronald R. Bell
DRAWER'S SIGNATURE

⑈1577339⑈ ⑆071000039⑆ 11⑈44018⑈

17

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1577340

DEC 13 1979

2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK — $12 and 00 Cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

John H. Brown Jr.
DRAWER'S SIGNATURE

⑈1577340⑈ ⑆071000039⑆ 11⑈44018⑈

18

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1579354

DEC 13 1979

2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

N.S.

CONTINENTAL BANK — $20 and 00 Cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

Mitchell Chard
DRAWER'S SIGNATURE

⑈1579354⑈ ⑆071000039⑆ 11⑈44018⑈

Exhibit D

19

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1579355

DEC 13 1979

2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $150 and 00 cts

Gerald Peckonis
DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

⑈1579355⑈ ⑆071000039⑆ 11,111,110⑈

N.S.

20

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 158055

DEC 10 1979

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $150 and 00 cts

Paul Greenberg
DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

⑈158055⑈ ⑆071000039⑆ 11,111,110⑈

21

CONTINENTAL BANK
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP 1580552

DEC 10 1979

2-3
710

PAY TO THE ORDER OF Citizens for LaRouche

CONTINENTAL BANK $150 and 00 cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN $500

⑈1580552⑈ ⑆071000039⑆

Exhibit D

22

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC. No. 128585

141 W. JACKSON BLVD. PHONE 939 2167
UNDER STATE SUPERVISION CHICAGO, ILLINOIS 60604

DEC 11 1979

NAME OF REMITTER Kirby Oakley

PAY TO THE ORDER OF Citizens for LaRouche

DOLLARS 250 CENTS 00

NOT GOOD FOR MORE THAN $300.00 UNLESS COUNTERSIGNED

EXACTLY TWO HUNDRED AND 00 CTS DOLLARS

TO LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 2-425 710

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC. 142

⑈128585⑈ ⑆0710-01,25⑆ 1-000 4,20⑈

23

ACME CURRENCY EXCHANGE, INC. J 347127

212 WEST WASHINGTON ST. FRANKLIN 2-7748
NORTH END OF LOBBY CHICAGO, ILLINOIS
UNDER STATE SUPERVISION

DEC 11 1979

NAME OF REMITTER Mitchell Rush

PAY TO THE ORDER OF Citizens for LaRouche

DOLLARS 250 CENTS 00

NOT GOOD FOR MORE THAN $300.00 DOLLARS

ACME CURRENCY EXCHANGE, INC. 37

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 2-425 710

⑈347127⑈ ⑆0710-01,25⑆ 1-000 377⑈

24

MERCHANTS CURRENCY EXCHANGE 1 K 71647

53 W. JACKSON BLVD.
UNDER STATE SUPERVISION CHICAGO, ILLINOIS

DEC 11 79

NAME OF REMITTER Sandra Peretz Fredman

PAY TO THE ORDER OF Citizens for LaRouche

DOLLARS 250 CENTS 00

EXACTLY TWO HUNDRED AND 00 CTS DOLLARS

NOT GOOD FOR MORE THAN $300.00

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 2-425 710

NO. 1 MERCHANTS CURRENCY EXCHANGE INC.

⑈071647⑈ ⑆0710-01,25⑆ 1-000 888⑈

(1)

ROBERT HART
JANICE HART
2819 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

216

Pay to the order of Citizens for LaRouche $ 100.00

One Hundred & no/100 Dollars

The First National Bank of Chicago

For Deposit Only

(2)

ROBERT HART
JANICE HART
2819 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

Oct 21 1979 215

Pay to the order of Citizens for LaRouche $ 100.00

One Hundred & no/100 Dollars

The First National Bank of Chicago

For Deposit Only

JAN 03 1979

(3)

ROBERT HART
JANICE HART
2819 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

NOV 02 1979

Oct 31 1975 303

Pay to the order of Citizens for LaRouche $ 100.00

One Hundred & no/100 Dollars

The First National Bank of Chicago

For Deposit Only

EXHIBIT F

(1)

Personal Money Order

The Chase Manhattan Bank National Association New York, New York 10015

CHASE 89164098 210

December 21 19 79

Pay to the order of Citizens for LaRouche

ONE HUNDRED DOLLARS

Not valid over $1000.

Purchaser's Signature Walter E. Fauntroy

Purchaser's Address 222 Norman Ave, Buffalo, NY

PMO 5 Rev. 6-73

⑈89164098⑈ ⑆021000021⑆ 900⑉5⑉00151 7⑈

(2)

Personal Money Order

The Chase Manhattan Bank National Association New York, New York 10015

CHASE 89164107 1-2 210

December 21 19 79

Pay to the order of Citizens for LaRouche

ONE HUNDRED DOLLARS

Not valid over $1000.

Purchaser's Signature Diane Newman

Purchaser's Address 143 Livingston Ave. Buffalo NY

PMO 5 Rev. 6-73

⑈89164107⑈ ⑆021000021⑆ 900⑉5⑉00151 7⑈

(3)

DEC. 21, 1979

Personal Money Order

The Chase Manhattan Bank National Association New York, New York 10015

CHASE 89164116 1-2 210

December 21 19 79

Pay to the order of Citizens for LaRouche

ONE HUNDRED DOLLARS

Not valid over $1000.

Purchaser's Signature Linda Rock

Purchaser's Address 421 Norwood Ave Buffalo, NY

PMO 5 Rev. 6-73

⑈89164116⑈ ⑆021000021⑆ 900⑉5⑉00151 7⑈

Exhibit F

4

4

Dec. 26, 1979

Personal Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015

CHASE 89164125 1-2/210

December 21 19 79

Pay to the order of Citizens for LaRouche

ONE HUNDRED DOLLARS

Not valid over $1000.

Purchaser's Signature Jennifer Ro

Purchaser's Address 25 Ripley Pl. Buffalo N.Y.

PMO 5 (Rev. 6-78)

⑈89164125⑈ ⑆021000021⑆ 900⑉5⑉00151 7⑈

Page 2/2

EXHIBIT G

PERSONAL MONEY ORDER

THE CHASE MANHATTAN BANK

NEW YORK, N.Y. Dec 11, 1979 1-1/210

PAY (1)

TO THE ORDER OF Citizens For La Rouche

ONE HUNDRED AND 00 CTS

NOT VALID OVER $500.

Lyndon LaRouche
Signature

B of L

⑈305180⑈ ⑆021000018⑆ 99 6599⑈

PERSONAL MONEY ORDER

THE BANK OF NEW YORK

WE305181

NEW YORK, N.Y. Dec 11, 1979 1-1/210

PAY (2)

TO THE ORDER OF Citizens for LaRouche

ONE HUNDRED AND 00 CTS

NOT VALID OVER $500.

Jay P. Rubinstein
Signature

B of L

T ⑈305181⑈ ⑆021000018⑆ 99 6599⑈

PERSONAL MONEY ORDER

THE BANK OF NEW YORK

WE305182

NEW YORK, N.Y. Dec 11, 1979 1-1/210

PAY (3)

TO THE ORDER OF Citizens For LaRouche

ONE HUNDRED AND 00 CTS

NOT VALID OVER $500. ROGER H. HAM
145 LEVENGOOD AVE.
BUFFALO, N.Y. 14213

Signature

B of L

⑈305182⑈ ⑆021000018⑆ 99 6599⑈

EXHIBIT

VICTORIA A. LACY
MEL KLENETSKY
4728 N. ALBANY
CHGO, ILL. 60625

290

10/27 19 79 0710 0340

PAY TO THE ORDER OF Citizens for La Raviere 100.00

One Hundred and 00/100 DOLLARS

Amalgamated Trust & Savings Bank
Chicago, Illinois 60693

FOR Exp

Victoria A. Lacy

NO PERSONAL MONEY ORDER

28001 70-2334 / 719

DATE January 23 19 80

PAY TO THE ORDER OF Citizens for La Raviere

EXACTLY 250 AND 00/100 CTS

West Suburban Bank
LOMBARD, ILLINOIS

SIGNATURE Victoria A. Lacy

ADDRESS 3823 N. Lavergne

⑈25668⑈ ⑆0719⑈2354⑆ ⑈70⑈002⑈

Exhibit I

01

Paul Greenberg
Pay To The Order Of
Citizens For LaRouche

CITIZENS FOR LaROUCHE
CITIBANK

State of Wisconsin
MADISON
VOID ONE YEAR AFTER DATE
DRIVER / VEHICLE REFUND

A 2491927

FIRST WISCONSIN NATIONAL BANK OF MADISON

AUGUST 16, 1979

CHECK NUMBER	FUND	VOUCHER	AGENCY	SUB.	DISTRIB.
A2491927	11	10910	395	1	

PAY EXACTLY SIX AND 50/100 DOLLARS

$*********6.50

TO THE ORDER OF PAUL GREENBERG
2342 N 45 ST
MILWAUKEE WI

Page 1/1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following people in connection with an investigation conducted pursuant to 26 U.S.C. Section 9039(b):

Janice Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

Victoria A. Lacy
4823 North Lawndale
Chicago, Ill. 60618

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

William Lerch
144 Delaplain
Riverside, Ill. 60546

Robert E. Pierce
4728 North Albany
Chicago, Ill. 60625

Paul Greenberg
5637 N. Glenwood
Chicago, Ill. 60660

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Frank P. Rieche
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following people in connection with an investigation conducted pursuant to 26 U.S.C. Section 9039(b):

Mathew C. Guice
298 Normal Avenue
Buffalo, N.Y. 14213

Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

Khushro Ghandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

Roger Ham
143 Livingston Avenue
Buffalo, N.Y. 14213

Denise Ham
143 Livingston Avenue
Buffalo, N.Y. 14213

Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

Joyce H. Rubinstein
163 14th Street
Buffalo, N.Y. 14213

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Frank P. Rieche
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following people in connection with an investigation conducted pursuant to 26 U.S.C. Section 9039(b):

Therese M. Seiler
5637 N. Glenword
Chicago, Ill. 60660

Ronald R. Bettag
5639 A.S. Kings Highway
St. Louis, Mo. 63109

John H. Brown, Jr.
5815 North Wayne, Apt. 2
Chicago, Ill. 60660

Mitchell F. Hirsch
1103 West Grace
Chicago, Ill. 60613

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

Robert Hart
2819 W. Cullom Avenue
Chicago, Ill. 60618

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

Sander Peretz Fredman
1103 West Grace
Chicago, Ill. 60613

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Matching Fund Submission
of Citizens for LaRouche

Dear

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at (202) 523-4000 or on toll free number 800-424-9530. Please call Mr. Bogin upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order
Witness Fee

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO:

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at _____ _____, at _____ a.m./p.m. on _____ and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 26 U.S.C. §9039(b), concerning contribution made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the ____ day of _____ 1980.

_____
Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

_____
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esq.
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

RE: MUR 1158

Dear Mr. Ward:

Pursuant to certain statements made by you contained in your deposition which was concluded on April 17, 1980, I would like to take this opportunity to request once again, all documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania and of Lawrence K. Freeman, from January 1, 1979, to the present.

It is my understanding that a reason for your not complying completely with the provision in the April 17, 1980 subpoena regarding production of documents and records was because of the financial burden of production. Please be assured that any reasonable and necessary expenses incurred in such production of documents and records will be entirely remunerated.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person to whom the investigation is being conducted. You are advised that no such consent has been given in this case.

Thank you for your cooperation. If you have any questions, please call Robert I. Bogin, (202-523-4000), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Xerographic copy of April 17, 1980 subpoena.
2. Xerographic copy of Certificate of Compliance with the Right of Financial Privacy Act of 1978.

1 3 0 4 0 0 1 5 7 5

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

CERTIFICATE OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT OF 1978

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

From: Federal Election Commission

I hereby certify that the applicable provisions of the Right to Financial Privacy Act of 1978, 12 U.S.C. §§ 3401-3422, have been complied with as to the attached Subpoena Duces Tecum for the following financial records of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, except for those records specifically identified as pertaining to transactions of Lawrence K. Freeman:-

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and Lawrence K. Freeman from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Specifically, these records are being sought through the procedure provided in 12 U.S.C. § 3405.

Pursuant to the Right to Financial Privacy Act of 1978, good faith reliance upon this certificate relieves your institutuion and its emloyees and agents of any possible liability to the customer in connection with the disclosure of these financial records.

11 June 1980
Date

Charles N. Steele
General Counsel
Federal Election Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan
Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold E. Harrison, M.D.
5500 North Charles Street
Baltimore, Maryland 21210

RE: MUR 1158

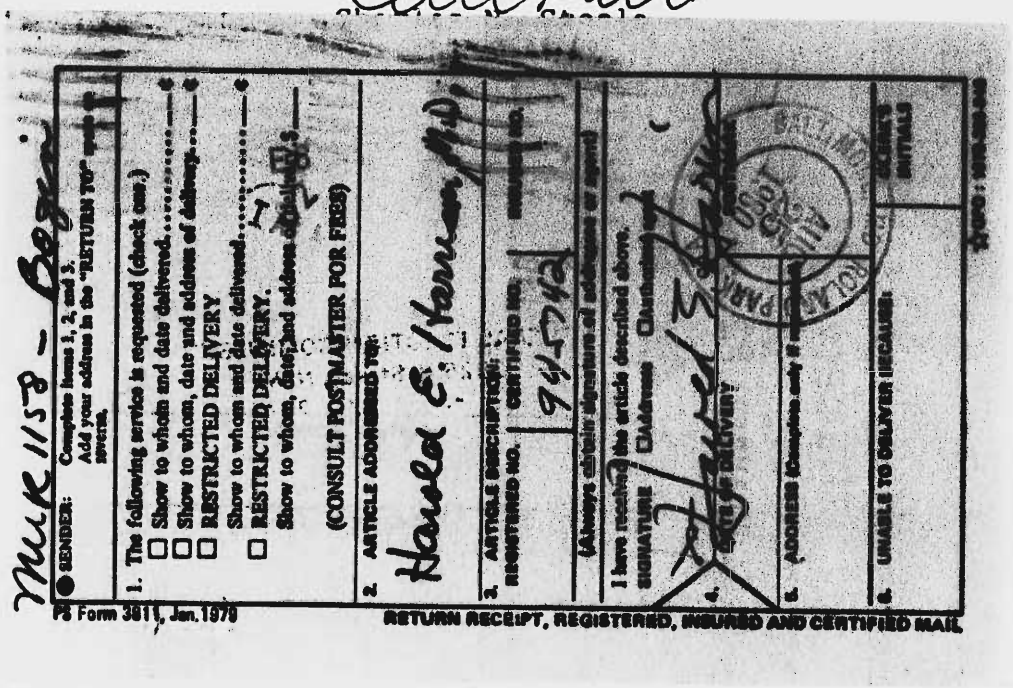
Dear Dr. Harrison:

I am enclosing a set of written questions, and an Order of the Commission, all directed to you. Please submit your answers as soon as possible but in no event later than 10 days of your receipt of this letter.

If you have any questions, please call Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Enclosures



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Harold E. Harrison, M.D.
5500 North Charles Street
Baltimore, Maryland 21210

RE: MUR 1158

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on Aug. 6, 1980.

Max L. Friedersdorf
Max L. Friedersdorf
Chairman

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

WRITTEN QUESTIONS UNDER ORDER

TO: Harold E. Harrison, M.D.

RE: MUR 1158

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and have an affidavit signed by you, and notarized.

You are required to submit your answers within ten (10) days of your receipt to these questions.

You are hereby advised of the provisions of 2 U.S.C. § 437g (a)(12) which prohibits anyone from making public any Commission investigation and provides for a fine up to $5,000 for a violation of that provision.

Please set forth your answers in the spaces provided below each question and return this original with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

For the purposes of these written questions, the term "cashier's check" refers to a cashier's check issued by Maryland National Bank, Post Office Box 987, Baltimore, Maryland 21203, bearing the notation ' near the upper right hand corner, also bearing the notation " " in the upper right hand corner, and also bearing the following series of numbers across the bottom: "

1. State your full name.

1a. State your current address.

1b. If you have lived at an address other than your current address set out above, since January 1, 1980, state that address.

2. Does the name HAROLD H. HARRISON, M.D., mean anything whatsoever to you?

2a. Do you know, or have you ever known, an individual named Bertha Harrison or F.E. Harrison?

3. Do you know, or have you ever known an individual named, variously, Debra Hanania Freeman, Dr. Debra Hanania, or Debra Hanania?

3a. If your answer to 3 above is in the affirmative, did you ever give her any money?

3b. If your answer to 3a above is in the affirmative, when, in what amount, in what form, and for what purpose?

4. State your relationship, if any, with the Citizens to LaRouche Committee.

4a. Are you in anyway familiar with the Lyndon LaRouche candidacy for the Democratic Presidential Nomination?

4b. Have you ever been contacted by a representative of the Citizens for LaRouche Committee for any reason whatsoever?

4c. If your answer to 4b above is in the affirmative, for what purpose?

4d. Have you ever made, or authorized to be made, a contribution in any form and in any amount, to the Citizens For LaRouche Committee?

5. Have you ever purchased, or had purchased in your name, a Cashier's Check from the Maryland National Bank in Baltimore, Maryland, during the month of January, 1980, in any amount whatsoever?

5a. If your answer to 5 above is in the affirmative, when, in what amount, and payable to whom?

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

M.D.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold E. Harrison, M.D.
5500 North Charles Street
Baltimore, Maryland 21210

RE: MUR 1158

Dear Dr. Harrison:

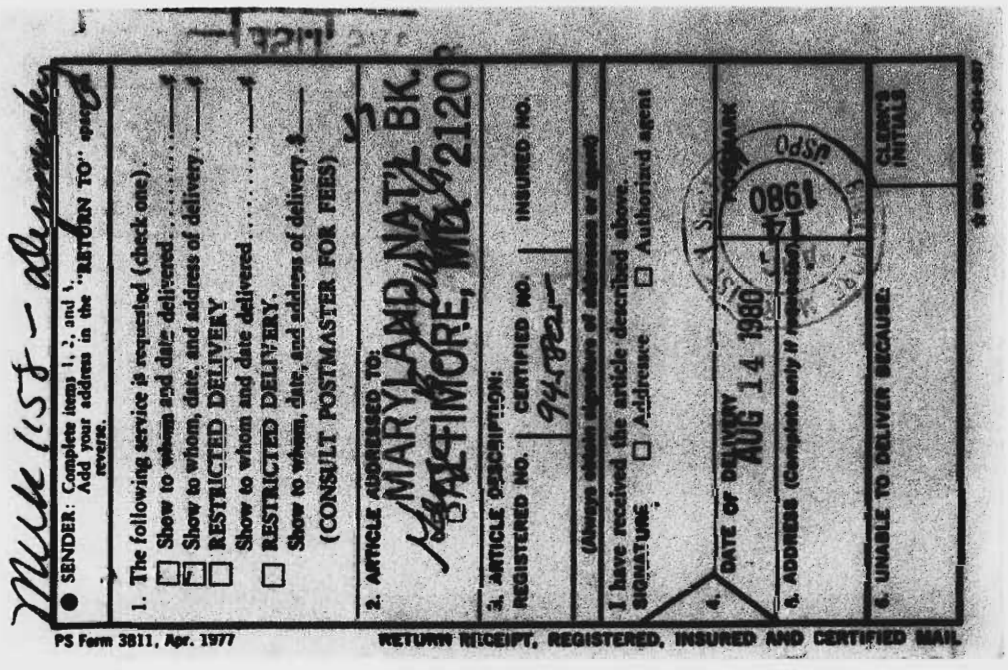
I am enclosing a set of written questions, and an Order of the Commission, all directed to you. Please submit your answers as soon as possible but in no event later than 10 days of your receipt of this letter.

If you have any questions, please call Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE mwe

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: AUGUST 6, 1980

SUBJECT: ORDER IN RELATION TO MUR 1158

The attached order in relation to MUR 1158, approved by a vote of 6-0 on August 5, 1980, has been signed and sealed this date.

ATTACHMENT:
Order - Harrison

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1158
Debra J. Hanania	)	
a.k.a. Debra Hanania Freeman	)	
a.k.a. Debra Hanania	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 5, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1158:

1. Authorize the Order to Harold E. Harrison, M.D. as attached to the General Counsel's July 31, 1980 memorandum.

2. Authorize the General Counsel to send the letter as attached to the above-named memorandum.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8/5/80
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 7-31-80, 3:11
Circulated on 48 hour tally vote basis: 8-1- 80, 2:00

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: AUGUST 5, 1980

SUBJECT: COMMENTS REGARDING MUR 1158

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding question 2.

ATTACHMENT:
Copy of Vote Sheet

July 31, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Please have the attached Memo distributed to the Commission on a 48 hour tally basis. Thank you.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUL 31 P3: 11

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Authorization to Issue Order in Connection with MUR 1158 (80)

Attached for Commission approval are an Order and Written Questions directed to Harold E. Harrison, M.D., at 5500 North Charles Street, Baltimore, Maryland, in furtherance of an investigation of the above matter.

The questions are drafted to establish that Harold Harrison, M.D., does not live at 3900 North Charles Street, despite the representation on the January 23, 1980 contribution verification form, attached hereto, and that Dr. Harrison did not make any contribution to CFL. We feel that written answers to the written questions attached, will sufficiently establish that Harold Harrison, M.D., did not contribute $250.00 to the Citizens for LaRouche Committee on January 14, 1980 via Cashier's Check, and that he did not sign a contribution verification form on January 23, 1980, pursuant to our investigation of Debra Hanania Freeman.

We have decided to proceed with written questions so that we are assured of having the basic facts about the cashier's check as soon as possible and without procedural delays.

RECOMMENDATIONS

1. Authorize the attached Order to Harold E. Harrison, M.D.
2. Authorize the General Counsel to send the attached letter.

Attachments

1. Authorization to Issue Order (1)
2. Letter (1)
3. Order to Answer Written Questions (1)
4. Written Questions Under Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes an Order to Answer Written Questions to be issued to:

Harold E. Harrison, M.D.
5500 North Charles Street
Baltimore, Maryland 21210

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Frank P. Reiche
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold E. Harrison, M.D.
5500 North Charles Street
Baltimore, Maryland 21210

RE: MUR 1158

Dear Dr. Harrison:

I am enclosing a set of written questions, and an Order of the Commission, all directed to you. Please submit your answers as soon as possible but in no event later than 10 days of your receipt of this letter.

If you have any questions, please call Robert J. Bodin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

43M 19852 R

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158 GCC
DEFENDANT	**TYPE OF PROCESS**
FEC Administrative Action (1)	Subpoena 2278

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
David C. Sanders

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
613 St. Ann Street, Baltimore, Maryland 21218

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	60

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Individual may reside with one Diana Sahyoun, 613 St. Ann's Avenue, Baltimore, Maryland 21218; Telephone No. 467-4355.

Signature of Attorney or other Originator requesting service on behalf of:		TELEPHONE NUMBER	DATE
Michael A. Dymersky	☒ PLAINTIFF ☐ DEFENDANT	(202) 523-4039	7/22/80

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
	1	No	No	Karen Wolford	

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)
DAVID SAUNDERS

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode

Address (complete only if different than shown above)

Date of Service 7-30-80 Time 6:00 ☒ pm ☐ am

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal	Amount of Refund
2.00	1.44	—	3.44			

REMARKS

ENDEAVOR RIGHT AT 25TH OFF 35.(5
TRY NIGHT 7/28 GREEN MOUNT TWO BLOCKS
STREET NOT MARKED
HOUSE LISTED TO - DIANA SAHYOUN
6 MILES RT

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 11/11/77)

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

USM 19852

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158
DEFENDANT	TYPE OF PROCESS
FEC ADministrative Action (1)	Subpoena

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Nancy B. Radcliffe

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
3215 North Charles Street, Apt. 206, Baltimore, Maryland 21218

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Individual may reside at 308 E. 31st Street under the name "N. Radcliffe;" telephone No. 889-2942. The telephone no. for the North Charles address is 467-0202.

Signature of Attorney or other Originator requesting service on behalf of	☒ PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
Michael A. Dymersky		(202) 523-4039	7/22/80

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No	No	Karen Wolford	

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc. shown at the address inserted below.

☒ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above. (See remarks below)

Name and title of individual served (if not shown above)

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode

Address (complete only if different than shown above)

Date of Service | Time | am pm

Signature of U.S. Marshal or Deputy
Lou Spikes

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal*	Amount of Refund
—	2.16	—	2.16			

REMARKS:
Endeavor - at 3215 N. Charles St. - Mr. V. Damon Rental Agt. States 7/28/80 nobody by above name ever lived there L.S.S.
Endeavor - at 308 E. 31st St. - Not home - left info. L.S.S.
A Phone endv. at 308 E. 31st #889-2942, spoke with Lady who stated she was not Mrs Radcliffe, and that this was not 305 E 31st Ste. H&M 7/29/80 approx 9:35 AM.
9:15 AM 8/9/80 ENDEAVOR: NOT AT HOME: NAME ON FRONT DOOR: NITE STANCE. L.S.S.

PRIOR EDITIONS MAY BE USED
8/4/80 Endeavor: 1. CLERK OF THE COURT NOT AT HOME. 7:20 PM RMB 8 MILE RD

FORM USM-285 (Rev. 11/11/77)

Freeman
4004 Linkwood Rd.
Baltimore Md 21210

8320371





Mr. Charles Steele
General Counsel
Federal Election Commission
1325 K St. NW
Washington DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

SERVICE BY
UNITED STATES MARSHALL

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

It should be noted, however, that as a result of problems connected with service, we have changed the date and time on which you are to appear to August 5, 1980, at 3:00 P.M. The location remains at Room 820, U. S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland.

Any questions concerning the attached subpoena should be directed to Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Nancy E. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 3:00 ~~a.m.~~ (p.m.) on July 21, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

4SM 19852

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158
DEFENDANT XXXXX	TYPE OF PROCESS
FEC administrative action (1)	Subpoena

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Kevin C. Salisbury

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
1909 N. Forest Park Ave., Apartment T-3, Baltimore, Md. 21207

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

NO ANSWER changed to 298-8849

Telephone No. 298-8849 or 448-4667

Signature of Attorney or other Originator requesting service on behalf of: ☒ PLAINTIFF ☐ DEFENDANT | TELEPHONE NUMBER: (202) 523-4039 | DATE

Michael A. Dymersky

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No	No	Karen Wolford	

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above. (See remarks below)

Name and title of individual served (if not shown above)

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode

Address (complete only if different than shown above)

Date of Service | Time: am / pm

Signature of U.S. Marshal or Deputy
Lou Spinka

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal	Amount of Refund (Check enclosed)
—	—	—	—			

REMARKS:

Endeavor- 7/28/80 - Moved - Mayfields live there now. L.S.
Please return for better address
I DEPUTY ELIJAH REESE CALL MR. KEVIN SALISBURY ON 8/4/80 AT 9:00 ABOUT THIS SUBPOENA I WANT HIS NEW ADDRESS. HE TOLD ME HE WILL NOT GIVE ME HIS NEW ADDRESS AND IF (FEC) WANT HIM THEY WILL HAVE TO GET A WARRANT,

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 11/11/77)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

SERVICE BY
UNITED STATES MARSHALL

Kevin Salisbury
1909 N. Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

It should be noted, however, that as a result of problems connected with service, we have changed the date and time on which you are to appear to August 5, 1980, at 1:00 P.M. The location remains at Room 820, U. S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland.

Any questions concerning the attached subpoena should be directed to Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Kevin C. Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 830, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 1:00 ~~a.m.~~ (p.m.) on July 21, 1980, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf
Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

7170

U. S. DEPARTMENT OF JUSTICE
DISTRICT OF MARYLAND
RETURN IN FIVE DAYS TO
OFFICE OF
UNITED STATES MARSHAL
606 U.S. COURTHOUSE
101 WEST LOMBARD STREET
BALTIMORE, MARYLAND 21201

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

POSTAGE AND FEES PAID
U. S.
DEPARTMENT OF JUSTICE
JUS-431



20

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

SERVICE BY
UNITED STATES MARSHALL

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

It should be noted, however, that as a result of problems connected with service, we have changed the date and time on which you are to appear to August 5, 1980, at 3:00 P.M. The location remains at Room 820, U. S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland.

Any questions concerning the attached subpoena should be directed to Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

2 0 4 0 3 7 1 7 0 6

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Nancy D. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 830, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 3:00 ~~a.m.~~ (p.m.) on July 21, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7 1 0 7 . . .

Government Printing Office 1978—253-756

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158
DEFENDANT	TYPE OF PROCESS
FEC ADministrative Action	Subpoena

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Nancy B. Radcliffe

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
3215 North Charles Street, Apt. 206, Baltimore, Maryland 21218

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form 285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Individual may reside at 308 E. 31st Street under the name "N. Radcliffe;" telephone No. 889-2942. The telephone no. for the North Charles address is 467-0202.

Signature of Attorney or other Originator requesting service on behalf of	☒ PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
		(202) 523-4039	7/22/80

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No	No		

I hereby certify and return that ☐ I have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)	☐ A person of suitable age and discretion then residing in the defendant's usual place of abode
Address (complete only if different than shown above)	Date of Service / Time: ☐ am ☐ pm
	Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charge (including endorsements)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal*	Amount of Refund (Check payable to U.S. Marshal)

*(If more than one USM 285 is submitted)

1. CLERK OF THE COURT

FORM USM-285 (Rev. 11-15-70)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

SERVICE BY
UNITED STATES MARSHALL

David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

RE: MUR 1158

Dear Mr. Sanders:

In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

It should be noted, however, that as a result of problems connected with service, we have changed the date and time on which you are to appear to August 5, 1980, at 10:00 A.M. The location remains at Room 820, U. S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland.

Any questions concerning the attached subpoena should be directed to Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

RE: MUR 1158

Dear Mr. Sanders:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 920, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 10:00 a.m. ~~p.m.~~ on July 23, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf
Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Government Printing Office 1978—253 756

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158
DEFENDANT	**TYPE OF PROCESS**
FEC Administrative Action	Subpoena

SERVE → **AT**

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
David C. Sanders

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
613 St. Ann Street, Baltimore, Maryland 21218

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Individual may reside with one Diana Sahyoun, 613 St. Ann's Avenue, Baltimore, Maryland 21218; Telephone No. 467-4355.

Signature of Attorney or other Originator requesting service on behalf of	☒ PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
		(202) 523-4039	7/22/80

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only for USM 285 if more than one USM 285 is submitted)		District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No.	No.		

I hereby certify and return that I ☐ have personally served ☐ have legal evidence of service, ☐ have executed as shown in "Remarks" the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	☐ A person of suitable age and discretion then residing in the defendant's usual place of abode
Address (complete only if different than shown above)	Date of Service / Time am pm
	Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal*	Amount of Refund*

*Amount of Refund

1. CLERK OF THE COURT

FORM USM-285 Rev. 11-15-70

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

SERVICE BY
UNITED STATES MARSHALL

Kevin Salisbury
1909 N. Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

It should be noted, however, that as a result of problems connected with service, we have changed the date and time on which you are to appear to August 5, 1980, at 1:00 P.M. The location remains at Room 820, U. S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland.

Any questions concerning the attached subpoena should be directed to Robert I. Bogin (202/523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Private Use $300

I14502

Kevin C[illegible]
1909 Fo[illegible]
Apartment [illegible]
Baltimore, [illegible] 212[illegible]

RETURNED TO SENDER
REFUSED
UNCLAIMED
SEP 07

CONFIDENTIAL/PERSONAL

WASHINGTON, DC 20
PM
9 JUL
1980

POSTAGE AND FEES PAID

CERTIFIED
945516

3 9 4 0 3 7 1 7 6

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery .... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Kevin C. Salisbury

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 845576 | INSURED NO.

I (Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆ GPO: 1979-272-865

MCK 1158 - K. Smith

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Kevin C. Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 320, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 1:00 ~~a.m.~~ (p.m.) on July 21, 1980, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7117

Government Printing Office 1978--253-758

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No. 5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	MUR 1158
XXXXX	TYPE OF PROCESS
FEC administrative action	Subpoena

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Kevin C. Salisbury

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
1909 N. Forest Park Ave., Apartment T-3, Baltimore, Md. 21207

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Michael A. Dymersky
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Telephone No. 298-8849 or 448-4667

Signature of Attorney or other Originator requesting service on behalf of:	XX PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
		(202) 523-4039	

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only first USM 285 if more than one USM 285 is submitted)	Total	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No.	No.		

I hereby certify and return that I ☐ have personally served ☐ have legal evidence of service, ☐ have executed as shown in "Remarks" the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)	☐ A person of suitable age and discretion then residing in the defendant's usual place of abode
Address (complete only if different than shown above)	Date of Service / Time: ☐ am ☐ pm
	Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount Owed to U.S. Marshal	Amount of Refund (Check enclosed)

REMARKS:

PRIOR EDITIONS MAY BE USED

1 CLERK OF THE COURT

FORM USM-285 Rev. 11-15-70

RECEIVED
909564
80 JUL 25 PM 1:08
GCC
2069

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1980

HAND DELIVERED

80 JUL 25 P2:43

Sidney Hurwitz
Manager
Mailing Requirements and
Claims Section
U.S. Postal Service
900 E. Fayette Street
Baltimore, Maryland 21233

RE: MUR 1158

Dear Mr. Hurwitz:

We are currently undertaking an investigation pursuant to the investigatory powers conveyed to the Commission by Section 437d of the Federal Election Campaign Act, as amended.

In conformance with 2 U.S.C. § 437d(a)(3), the Commission has issued subpoenas, sent certified mail, return receipt requested, requiring the attendance of certain below listed individuals to facilitate the taking of testimony. However, there are indications that either the subpoenas have not been delivered because of inconsistencies in the addressees' names or inconsistencies in the addressees' street addresses. Therefore, we request that (1) the Mailing Requirements Section determine if the subpoenas have been delivered or are undeliverable, and (2) initiate address verification for each individual.

The respective individuals' names and addresses are as follows:

Name and Address	Return Receipt No.
David C. Sanders 613 St. Ann Street Baltimore, Maryland 21218	945518

Nancy B. Radcliffe
3215 North Charles Street
Apartment 206
Baltimore, Maryland 21218

945517

Kevin C. Salisbury
1909 Forest Park
Apartment T-3
Baltimore, Maryland 21207

945516 R/S on 7/29/80

Harold Harrison
3900 North Charles Street
Baltimore, Maryland 212~~10~~18

945513

Anne R. Taylor
1304 John Street
Baltimore, Maryland 21217

945519 OK

Charles Clark
14 North Hilton Street
Baltimore, Maryland 212~~19~~29

945520

Ernest K. Pulsifor
209 Second Avenue, S.E.
Glen Burnie, Maryland 21061

945521 7/11/80 OK

MD 7/80

Your cooperation in this matter is greatly appreciated.

Sincerely,

Charles N. Steele
General Counsel

UNITED STATES POST OFFICE
CLAIMS & INQUIRY
BALTIMORE, MD. 21233

3 3 1 1 7 2 1 7 2 1

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, $300

RECEIVED
'83 JUL 25 PM 1:08

U.S.MAIL

OFFICIAL BUSINESS
EP188

Attn. Mr. Hal Ponder

Federal Election Commission
Office Of General Counsel
1325 K Street
Washington, D. C 20463

21037172

July 19, 1980

Memorandum to: File (MUR 1158)

From: Michael A. Bernardy

Subject: MUR 1158

After diligent research, it appears that there are problems with respect to the names and addresses of the seven (7) deponents scheduled for July 21, and July 22, respectively.

Specifically, there are no listings for: David C. Sanders at 613 St. Ann Street, Baltimore, or any other address; Nancy B. Radcliffe at 3215 North Charles Street, Baltimore, or any other address; though there is a Radcliffe listed at North Charles Street, and a Mr Radcliffe listed at 31st Street — both of whom represent that they

(2)

are not Mary E. Radcliffe; Kevin C. Salisbury at 1909 Forest Park, Baltimore, or any other address; or, Charles Clark at 14 North Wilton Street, Baltimore, or any other address. The Baltimore operator at ((301) 555-1212) indicated that a Harold E. Harrison (M.D.) was listed at (323-1550), 5500 North Charles Street, Baltimore, but ~~that~~ upon further investigation, there was no Harold H. Harrison at that address, and the former indicated that he was unaware of who Jordan Jo Rondeau was, and that he did not make political contributions. The discrepancy exists in this case in the addresses. The individual to whom we sent the subpoena purportedly lived at 3900 North Charles Street. However, I A

"Bertha" Harrison resides there, and she indicates that (1) there is no Harold Harrison living at that address, and (2) that she has never received any subpoena, and (3) that if she ever received any mail with an addressee other than herself, she returns it immediately to the post office. At the case of Ernest Pulsifer, at 309 3rd Ave. S.E., Glen Burnie, this office had two conversations with him subsequent to receipt by him of the subpoena. However, there is a different spelling in the Baltimore telephone book. Ernest's last name is spelled Pulsifer, though the address is the same as of record.

At the case of Anne K. Taylor, at 304 John Street, Baltimore, we received

(1)

a telephone call from her on July 19, 1980. In that conversation it was disclosed that she and her husband Adamson A. Taylor are both Republicans; that they have never contributed to Lyndon LaRouche, and that her name is spelled Ann A. Taylor, not Anne K. Taylor. Further it was stated that she signs her name "Ann Adamson Taylor."

On July 18, 1980, I contacted both Ernest Polsinelli residence, and ~~Anne K.~~ Mrs. Taylor. She told me I was the person I spoke with a member of Ernest' family (I presume) and left a message for him to have previously cancelled checks, etc. w/ signatures, and, in the case of the latter, I spoke directly with her, and she agreed to

1 3 1 0 3 7 1 7 2 5

(5)

bring previous signed documents/
instruments.

FEC 1980

RECEIVED

'80 JUL 18 PM 4:28

RUSSELL G. DEVOE
ATTORNEY AT LAW

2343 FOSTER AVENUE
PARKVILLE, MARYLAND 21234
TELEPHONE - 301 [redacted]
665-7983

909159

July 16, 1980

Federal Election Commission
1325 K Street N.W.
Washington D.C. 20463

ATTN: Hal Ponder

RE: Earnest K. Pulsifer
MUR-1158
Hearing Date July 23, 1980

Dear Commissioner Ponder:

Please be advised that I have been retained to represent Mr. Pulsifer at the hearing scheduled in Baltimore, Maryland on July 23, 1980 before the honorable commission.

If I may be a assistance prior to the hearing please contact me at the above address.

Very truly yours,

Russell DeVoe

RD/km

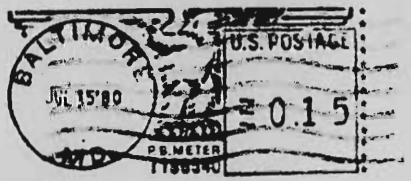
30 JUL 21 PM 2:17

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

2 4 4 0 3 7 1 7 2 7

RUSSELL G. DeVOE
2343 FOSTER AVE.
PARKVILLE, MD 21234





Federal Election Commission
1325 K Street N.W.
Washington D.C. 20463

ATTN: Hal Ponder

RECEIVED
'80 JUL 18 PM 4:28

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1980

HAND DELIVERED

Sidney Hurwitz
Manager
Mailing Requirements and
Claims Section
U.S. Postal Service
900 E. Fayette Street
Baltimore, Maryland 21233

RE: MUR 1158

Dear Mr. Hurwitz:

We are currently undertaking an investigation pursuant to the investigatory powers conveyed to the Commission by Section 437d of the Federal Election Campaign Act, as amended.

In conformance with 2 U.S.C. § 437d(a)(3), the Commission has issued subpoenas, sent certified mail, return receipt requested, requiring the attendance of certain below listed individuals to facilitate the taking of testimony. However, there are indications that either the subpoenas have not been delivered because of inconsistencies in the addressees' names or inconsistencies in the addressees' street addresses. Therefore, we request that (1) the Mailing Requirements Section determine if the subpoenas have been delivered or are undeliverable, and (2) initiate address verification for each individual.

The respective individuals' names and addresses are as follows:

Name and Address	Return Receipt No.
David C. Sanders 613 St. Ann Street Baltimore, Maryland 21218	945518

Nancy B. Radcliffe
3215 North Charles Street
Apartment 206
Baltimore, Maryland 21218 — 945517

Kevin C. Salisbury
1909 Forest Park
Apartment T-3
Baltimore, Maryland 21207 — 945516

Harold Harrison
3900 North Charles Street
Baltimore, Maryland 21210 — 945513

Anne R. Taylor
1304 John Street
Baltimore, Maryland 21217 — 945519

Charles Clark
14 North Hilton Street
Baltimore, Maryland 21219 — 945520

Ernest K. Pulsifor
209 Second Avenue, S.E.
Glen Burnie, Maryland 21061 — 945521

Your cooperation in this matter is greatly appreciated.

Sincerely,

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter Parker, Esquire
700 Keyser Building
Baltimore, MD 21202

RE: MUR 1158

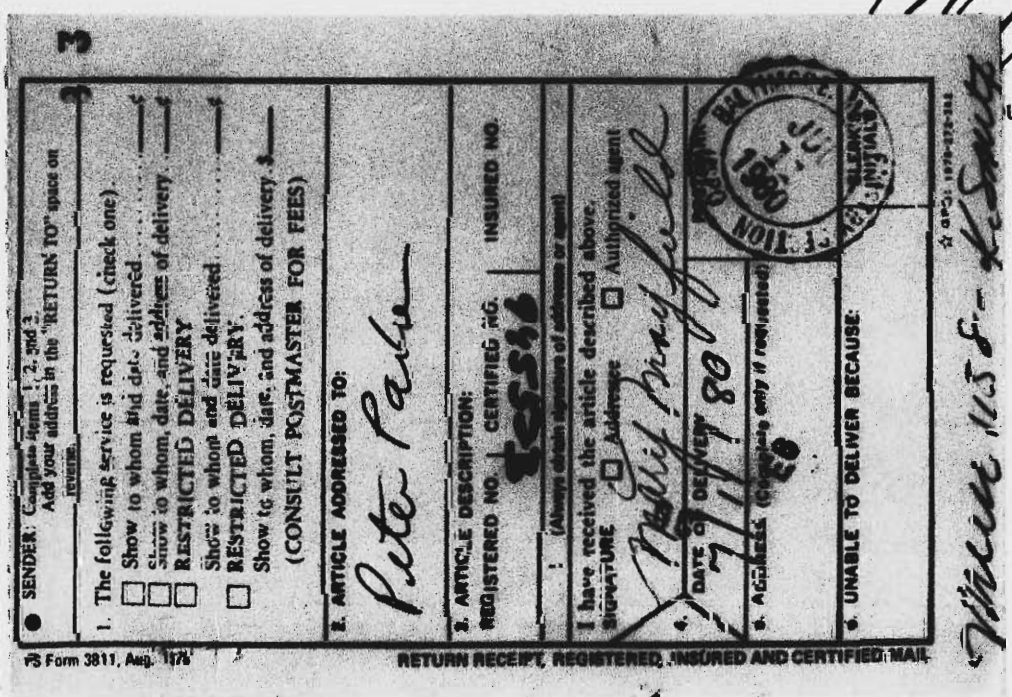
Dear Mr. Parker:

On February 19, 1980, the Federal Election Commission notified your client, Ms. Debra Hanania Freeman, that the Commission had reason to believe Ms. Freeman may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Commission has issued a subpoena and order requiring Ms. Freeman to appear as a witness and give sworn testimony and other evidence. Copies of these documents are enclosed for your information. The originals are being served upon your client.

If you have any questions, please direct them to Kevin H. Smith, the attorney handling this matter at (202) 523-4529.

Sincerely,

Steele
unsel



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 10:00 a.m. ~~p.m.~~ on July 30, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter Parker, Esquire
700 Keyser Building
Baltimore, MD 21202

RE: MUR 1158

Dear Mr. Parker:

On February 19, 1980, the Federal Election Commission notified your client, Ms. Debra Hanania Freeman, that the Commission had reason to believe Ms. Freeman may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Commission has issued a subpoena and order requiring Ms. Freeman to appear as a witness and give sworn testimony and other evidence. Copies of these documents are enclosed for your information. The originals are being served upon your client.

If you have any questions, please direct them to Kevin H. Smith, the attorney handling this matter at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosures (2)

Copy of subpoena and order
Copy of letter to Debra Hanania Freeman

KHS
note 2 enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

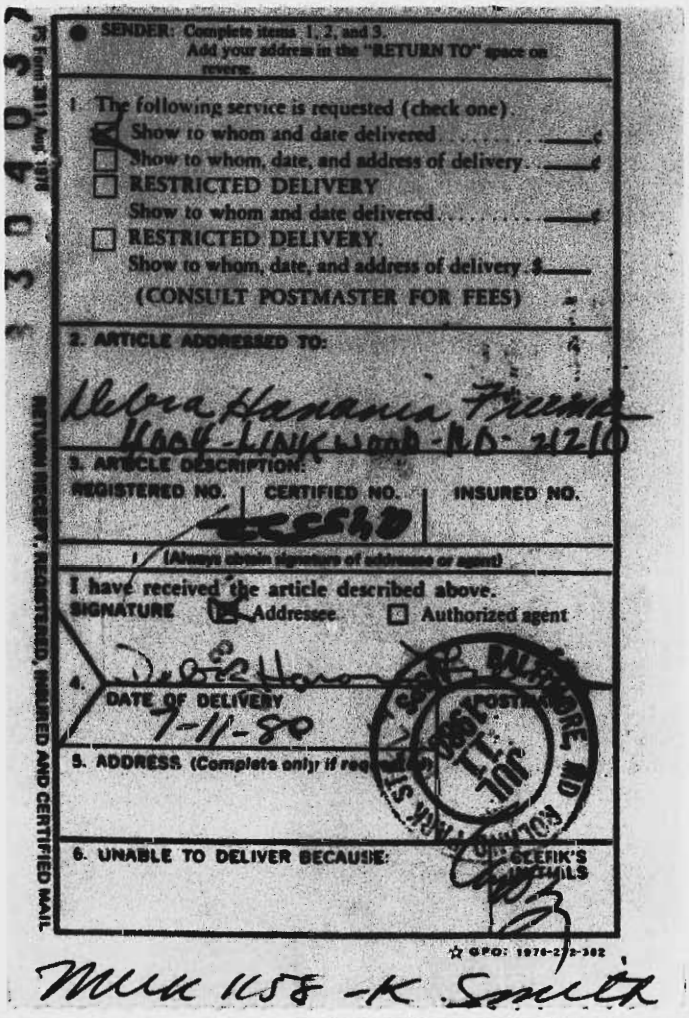
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

RE: MUR 1158

Dear Ms. Freeman:

On February 19, 1980, you received notification that the Commission had found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Federal Election Commission has issued the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence. Your attorney, Peter Parker, will receive a copy of this letter and of the subpoena.


SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
Show to whom and date delivered ____¢
Show to whom, date, and address of delivery ____¢
RESTRICTED DELIVERY
Show to whom and date delivered ____¢
RESTRICTED DELIVERY
Show to whom, date, and address of delivery $____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Debra Hanania Freeman
4004 LINKWOOD RD 21210

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
[illegible]

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
[signature]

4. DATE OF DELIVERY
7-11-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1976-212-382

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1158 - K. Smith

Sincerely,

Charles N. Steele
General Counsel

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 10:00 a.m. ~~p.m.~~ on July 30, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,377
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . REQUIRE IDENTIFICATION

United States Treasury 15-51 / 000

PAY TO THE
ORDER OF DEBRA H FREEMAN

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑆ ⑆000000518⑆ 754173772⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

RE: MUR 1158

Dear Ms. Freeman:

On February 19, 1980, you received notification that the Commission had found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Federal Election Commission has issued the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence. Your attorney, Peter Parker, will receive a copy of this letter and of the subpoena.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

cc: Peter Parker, Esquire

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ernest K. Pulsifor
209 Second Ave. S.E.
Glen Burnie, MD 21061

RE: MUR 1158

Dear Mr. Pulsifor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

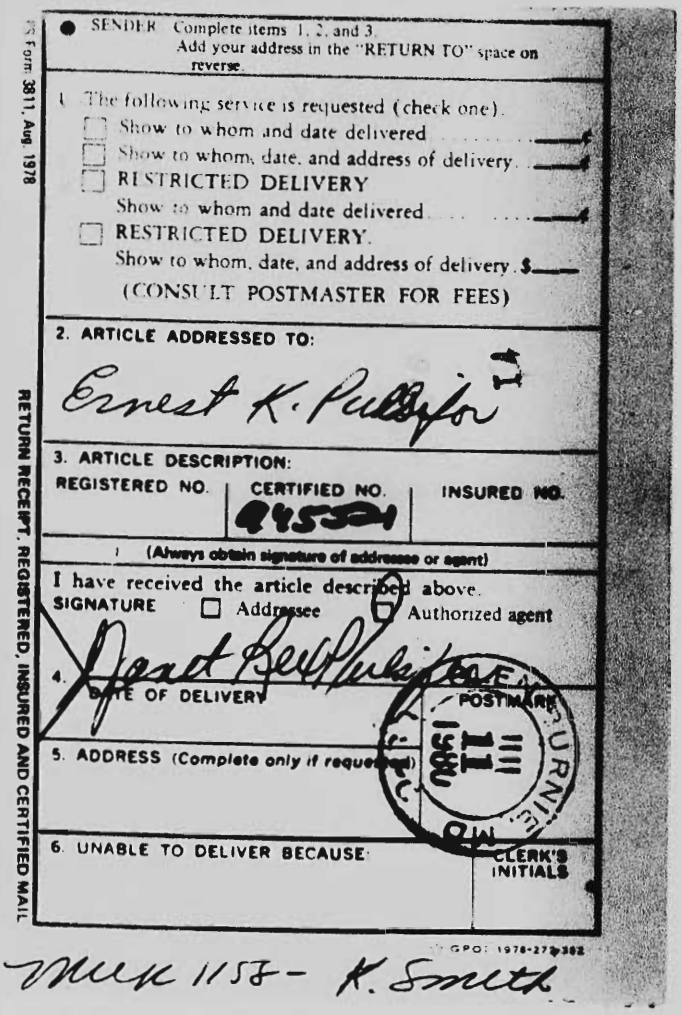
If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Ernest K. Pulsifer

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 945391 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Ernest K. Pulsifer

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE | CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811, Aug. 1978

GPO: 1978-271-382

MLK 1158 - K. Smith

1 5 0 4 5 7 1 7 3 7

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Ernest K. Pulsifor
209 Second Ave. S.E.
Glen Burnie, MD 21061

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard Baltimore, Maryland, at 4:15 ~~a.m.~~ (p.m.) on July 23, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,384
SYMBOL 3004

DO NOT FOLD SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . REQUIRE IDENTIFICATION

United States Treasury 15-51 000

PAY TO THE
ORDER OF ERNEST K PULSIFOR

DOLLARS	CTS.
$*****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑆ ⑆000000518⑆ 754173849⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ernest K. Pulsifor
209 Second Ave. S.E.
Glen Burnie, MD 21061

RE: MUR 1158

Dear Mr. Pulsifor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

KHS

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Clark
14 North Hilton Street
Baltimore, MD 21219

RE: MUR 1158

Dear Mr. Clark:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

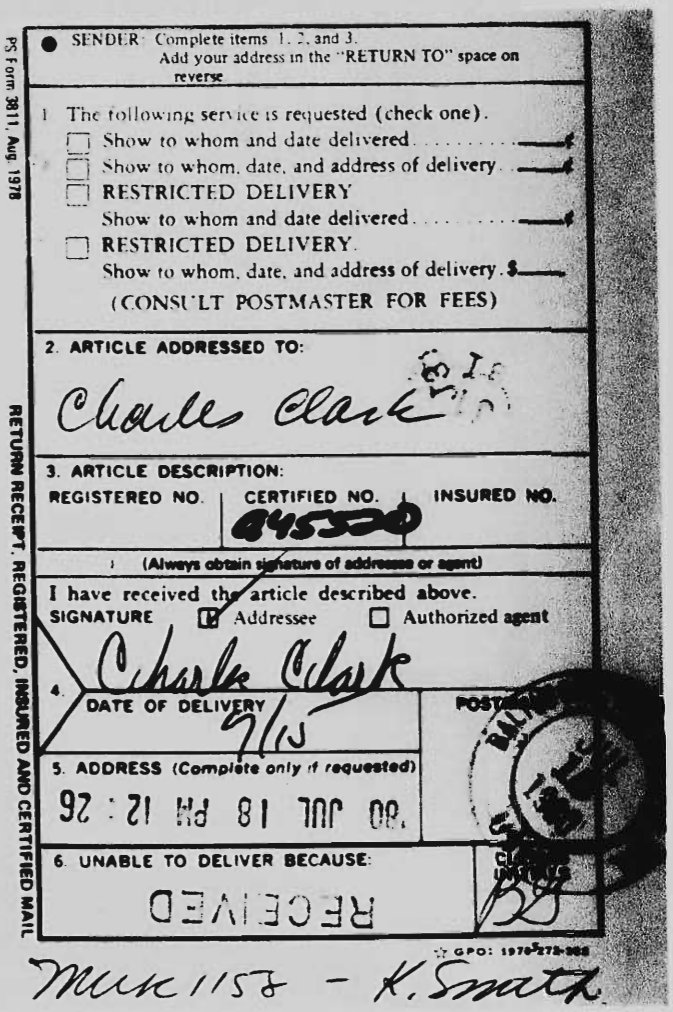
If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).
- ☐ Show to whom and date delivered
- ☐ Show to whom, date, and address of delivery
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Charles Clark

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 845330 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
Charles Clark

4. DATE OF DELIVERY 7/15 POSTMARK

5. ADDRESS (Complete only if requested)
'80 JUL 18 PM 12:26

6. UNABLE TO DELIVER BECAUSE:
RECEIVED

CLERK'S INITIALS

☆ GPO: 1979 273-988

Mark 1158 - K. Smith

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Charles Clark
14 North Hilton St.
Baltimore, MD 21219

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 2:30 ~~a.m.~~ (p.m.) on July 23, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,383
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . REQUIRE IDENTIFICATION

United States Treasury 15-51 000

PAY TO THE
ORDER OF CHARLES CLARK

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173838⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Clark
14 North Hilton Street
Baltimore, MD 21219

RE: MUR 1158

Dear Mr. Clark:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

KHS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anne R. Taylor
1304 John St.
Baltimore, MD 21217

RE: MUR 1158

Dear Ms. Taylor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

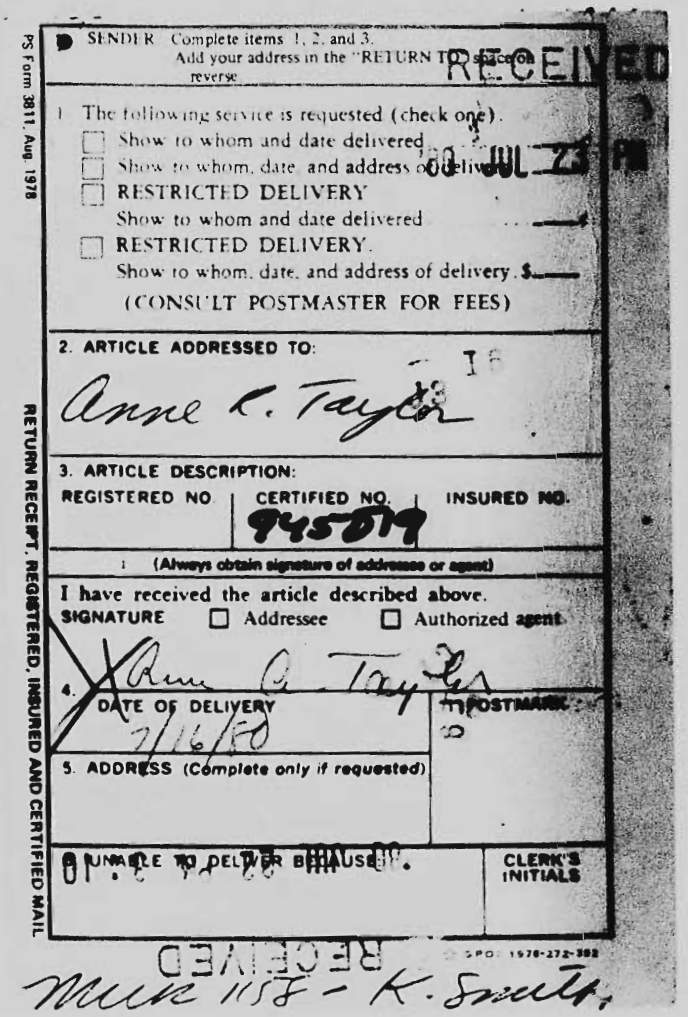
If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

RECEIVED
80 JUL 23 PM

1. The following service is requested (check one).
- ☐ Show to whom and date delivered
- ☐ Show to whom, date, and address of delivery
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Anne C. Taylor

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945019	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Anne C. Taylor

DATE OF DELIVERY 7/16/80

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO: 1978-272-382

RECEIVED
Mail Rm - K. Smith

P 945 019 747

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Anne R. Taylor
1304 John St.
Baltimore, MD 21217

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 11:45 (a.m.) ~~p.m.~~. on July 23, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,382
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . ACQUIRE IDENTIFICATION

United States Treasury 15-51 / 000

PAY TO THE
ORDER OF ANNE R TAYLOR

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173827⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anne R. Taylor
1304 John St.
Baltimore, MD 21217

RE: MUR 1158

Dear Ms. Taylor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

KHS

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

RE: MUR 1158

Dear Mr. Sanders:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

RECEIVED
80 JUL 15 PM 12

1. The following service is requested (check one).
- [X] Show to whom and date delivered
- [ ] Show to whom, date, and address of delivery
- [ ] RESTRICTED DELIVERY
- [ ] Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
- [ ] Show to whom, date, and address of delivery. $____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
David C. Sanders II

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 945578 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [X] Addressee [ ] Authorized agent
David C. Sanders

4. DATE OF DELIVERY 7-12-80
POSTMARK BALTIMORE, MD. ROLAND PARK STA. JUL 15 1980 USPS

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE | CLERK'S INITIALS

Mail 1158 - K. Smith

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 10:00 a.m. ~~p.m.~~ on July 23, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf
Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,378
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . REQUIRE IDENTIFICATION

United States Treasury 15-51 / 000

PAY TO THE ORDER OF DAVID C SANDERS

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

Henry H. Eden
DISBURSING OFFICER

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173783⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

RE: MUR 1158

Dear Mr. Sanders:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

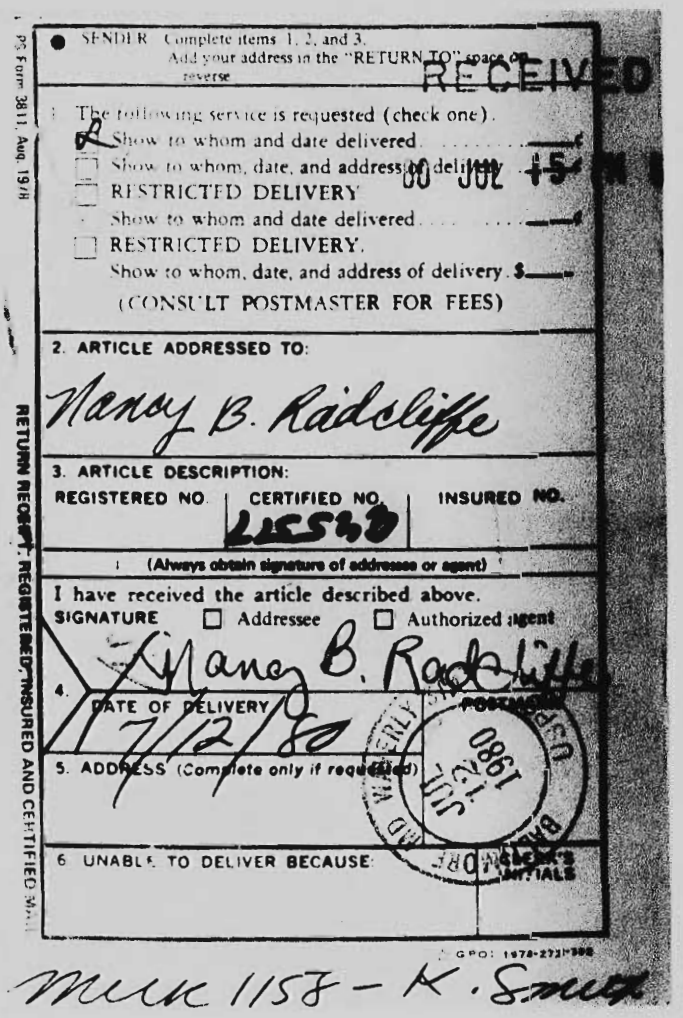
If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order



PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

RECEIVED
80 JUL 15 AM

The following service is requested (check one).

☑ Show to whom and date delivered . . . . . ¢

☐ Show to whom, date, and address of delivery . . . . . ¢

☐ RESTRICTED DELIVERY

Show to whom and date delivered . . . . . ¢

☐ RESTRICTED DELIVERY.

Show to whom, date, and address of delivery . $

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Nancy B. Radcliffe

3. ARTICLE DESCRIPTION:

REGISTERED NO. | CERTIFIED NO. | INSURED NO.

P 115 371 753

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Nancy B. Radcliffe

4. DATE OF DELIVERY 7/12/80

POSTMARK

U.S. POSTAGE JUL 12 1980 BALTIMORE MD

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO: 1978-272-398

Mmk 1158 - K. Smith

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 3:00 ~~a.m.~~ p.m. on July 21, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,379
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . REQUIRE IDENTIFICATION

United States Treasury 15-51/000

PAY TO THE
ORDER OF NANCY B RADCLIFFE

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	03	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173794⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

KHS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Kevin C. Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 1:00 ~~a.m.~~ (p.m.) on July 21, 1980, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,380
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . REQUIRE IDENTIFICATION

United States Treasury 15-51 000

PAY TO THE
ORDER OF KEVIN C SALISBURY

DOLLARS	CTS.
$****30	00

MONTH	DAY	YEAR
07	Q3	80

95350001

F E C
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173805⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

3 0 0 0 7 1 7 6 7

WASHINGTON, DC 20
PM
9 JUL
1980

POSTAGE AND FEES PAID
U.S. MAIL

RETURNED TO SENDER
ADDRESSEE UNKNOWN
21213

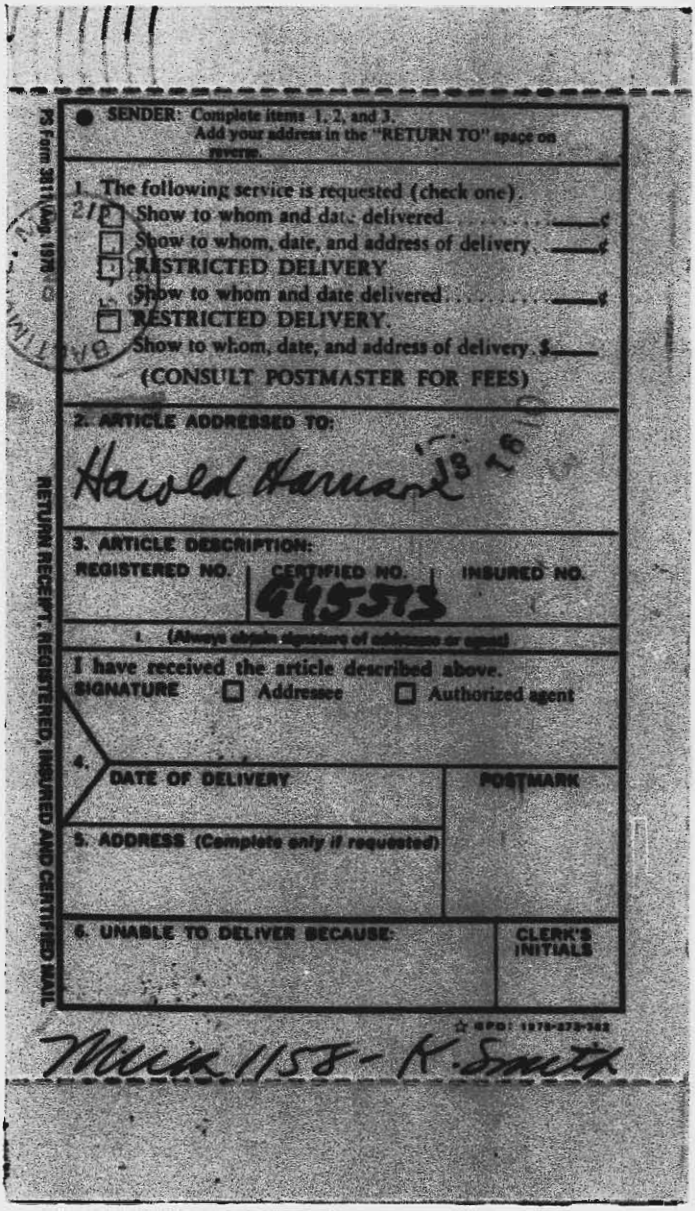
UNK
1805 M

Harold Harrison
3900 N. Charles Street
Baltimore, MD 21218

RETURNED TO SENDER
ADDRESSEE UNKNOWN
21213

CONFIDENTIAL/PERSONAL

CERTIFIED
945513



PS Form 3811, Aug. 1978

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Harold Harman JS Inc

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	445513	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1979-273-362

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Mail 1158 - K. Smith

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Harrison
3900 N. Charles St
Baltimore, MD 21210

RE: MUR 1158

Dear Mr. Harrison:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

UNITED STATES OF AMEPICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: Harold Harrison
3900 N. Charles St
Baltimore, MD 21210

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 820, U.S. Courthouse, 101 W. Lombard St. Baltimore, Maryland, at 10:00 a.m. on July 21, 1980 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with a lawful investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 26th day of June 1980.

Max L. Friedersdorf

Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 75,417,381
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER - REQUIRE IDENTIFICATION

United States Treasury 15-51/000

PAY TO THE
ORDER OF HAROLD HARRISON

DOLLARS	CTS.
$*****30	00

MONTH	DAY	YEAR
07	03	80

95350001

FEC
WASH DC
W0274

FEOAW380 WITNESS MUR1158

⑈3004⑈ ⑆000000518⑆ 754173816⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Harrison
3900 N. Charles St
Baltimore, MD 21210

RE: MUR 1158

Dear Mr. Harrison:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

KHS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORNADUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: JUNE 26, 1980

SUBJECT: SUBPOENAS IN RELATION TO MUR 1158

The attached subpoenas (8), approved by a vote of 6-0 on June 25, 1980, have been signed and sealed this date.

ATTACHMENTS:
(8) Subpoenas

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1158
Debra J. Hanania	)	
a.k.a. Debra Hanania Freeman	)	
a.k.a. Debra Hanania	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 25, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1158:

1. Authorize issuance of the subpoenas, as attached to the Memorandum to the Commission dated June 23, 1980, to:

    a) Debra Hanania Freeman, aka Dr. Debra J. Hanania aka Debra Hanania
    b) David C. Sanders
    c) Nancy B. Radcliffe
    d) Kevin Salisbury
    e) Harold Harrison
    f) Anne R. Taylor
    g) Charles Clark
    h) Ernest K. Pulsifor

2. Authorize the General Counsel to send the cover letters, as attached to the above-named memorandum, to Peter Parker, Esquire, Debra Hanania Freeman, David C. Sanders, Nancy B. Radcliffe, Kevin Salisbury, Harold Harrison, Anne R. Taylor, Charles Clark and Ernest K. Pulsifor.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

6/25/80
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 6-23-80, 12:27
Circulated on 48 hour vote basis: 6-23-80, 4:00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MWE

MEMORANDUM TO: CHARLES STERLE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: JUNE 26, 1980

SUBJECT: MUR 1158 - Needed Correction

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding a correction in the spelling of Mr. Pulsifor's name in the proposed letter.

ATTACHMENT:
Copy of Vote Sheet

June 23, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Jane Colgrove

SUBJECT: MUR 1158

Please have the attached Memo to the Commissionoan MUR 1158 distributed to the Commission on a 48 hour tally basis.

Thank you.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 JUN 23 P12: 27

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

RE: Authorization to Issue Subpoena in Connection with MUR 1158 (80)

Attached for Commission approval are deposition subpoenas directed to respondent and to those individuals whose purported contributions to Citizens for LaRouche may have been made by or falsely documented by respondent and submitted to the Commission for matching.

The testimony and handwriting exemplars sought by the subpoenas will assist us in determining whether violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) have occurred in this matter.

Recommendations

1. Authorize the attached subpoenas to:

   a) Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania
   b) David C. Sanders
   c) Nancy B. Radcliffe
   d) Kevin Salisbury
   e) Harold Harrison
   f) Anne R. Taylor
   g) Charles Clark
   h) Ernest K. Pulsifor

2. Authorize the General Counsel to send the attached cover letters to Peter Parker, Esquire, Debra Hanania Freeman, David C. Sanders, Nancy B. Radcliffe, Kevin Salisbury, Harold Harrison, Anne R. Taylor, Charles Clark and Ernest K. Pulsifor.

Attachments

1. Authorization Form
2. Subpoenas (8) with cover letters (9) to Peter Parker, Esquire, Debra Hanania Freeman, David C. Sanders, Nancy B. Radcliffe, Kevin Salisbury, Harold Harrison, Anne R. Taylor, Charles Clark and Ernest K. Pulsifor.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following people in connection with MUR 1158:

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, Md. 21210

David C. Sanders
613 St. Ann Street
Baltimore, Md. 21218

Nancy B. Radcliffe
3215 North Charles Street
Apartment 206
Baltimore, Md. 21218

Kevin C. Salisbury
1909 Forest Park,
Apartment T-3
Baltimore, Md. 21207

Harold Harrison
3900 N. Charles Street
Baltimore, Md. 21210

Anne R. Taylor
1304 John Street
Baltimore, Md. 21217

Charles Clark
14 North Hilton Street
Baltimore, Md. 21219

Ernest K. Pulsifor
209 Second Avenue, S.E.
Glen Burnie, Md. 21061

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Frank P. Rieche
Commissioner

The National Organization for Women believes in your right to choose

PRO-CHOICE MEANS .....

- if you want to have children, the government has no right to interfere
- consenting to sterilization should not be a requirment of other procedures (childbirth or abortion)
- the government has no right to demand that your pregnancy be revealed to either your husband or parents
- the community and government should provide information and access to contraceptive information and services
- when all is said and done, it is the pregnant woman's RIGHT to decide whether or not to terminate her pregnancy
- every woman, regardless of income, has a right to medical care during pregnancy, childbirth, or abortion
- support for research on birth defects, genetic counseling, birth control, pre- and post- natal care, and quality reproductive health care
- respect for women, our right to privacy, our right to religious freedom, our right to choose the number and the spacing of our children

ANTI-CHOICE MEANS .....

- anti-contraceptives
- anti-IUD's
- anti-birth control pills
- anti-voluntary sterilization
- anti-family planning
- anti-amniocentesis
- anti-birth defects research
- anti-responsible sex education
- anti-right to privacy
- anti-separation of church and state
- anti-abortion even to save the woman's life
- anti-woman's right to choose

"Right to Lifers" in Pennsylvania advocate death as a punishment for abortion

ANTI-CHOICE IS ANTI-PEOPLE. THEY MUST BE STOPPED!

MYTH: No one has to get pregnant in this day and age. Forced pregnancy is the price for being careless or ignorant.

FACT: It costs far less to pay for abortions than to pay for forced pregnancies, support for mother and child, and medical care for the victims of botched abortions.

MYTH: We can't afford to pay for the abortions of poor women.

FACT: One-third of all couples practicing birth control for five years has an unwanted pregnancy. Only men are secure in the knowledge that they can't get pregnant.

MYTH: If contraceptive information and services are improved, it will encourage teens to have more sexual relationships.

FACT: 5,000 women between the ages of 14 and 20 become pregnant in Maine each year. 70% are using no method of birth control. Teen pregnancies are an alarming reality. Contraceptive information and access, good pre- and post-natal care, and safe, legal abortions are all responses to the needs of our young women.

MYTH: Anti-choice is pro-life.

FACT: Four times as many women die of childbirth as of legal abortion. Teens have the highest mortality and morbidity rate. When your life and health are at stake, the choice should be yours.

did you know

- 80% of Maine people support the right of a woman to choose whether or not to terminate her pregnancy
- every pro-choice incumbant legislator identified by Maine anti-choice won re-election to the 109th Maine legislature
- even though the Democrats support abortion funding and voted that support into the Maine Democratic platform, every male Democratic senator voted the anti-choice position.
- Maine NOW testified at every hearing concerning Choice in the 109th legislature
- Maine NOW lobbied every Maine legislator on the issue of Choice, over half in person or by phone
- the Maine Legislature did not once support the pro-choice position on any piece of legislation in the 109th.

We must truly weigh what we know to be true. Childbirth can be an affirmation of life or a resignation to it.

Abortion can also be an affirmation of life, a position commitment to ourselves, and to those already in our lives.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

RE: MUR 1158

Dear Ms. Freeman:

On February 19, 1980, you received notification that the Commission had found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Federal Election Commission has issued the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence. Your attorney, Peter Parker, will receive a copy of this letter and of the subpoena.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

cc: Peter Parker, Esquire

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Sanders
613 St. Ann Street
Baltimore, MD 21218

RE: MUR 1158

Dear Mr. Sanders:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Clark
14 North Hilton Street
Baltimore, MD 21219

RE: MUR 1158

Dear Mr. Clark:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Harrison
3900 N. Charles St
Baltimore, MD 21210

RE: MUR 1158

Dear Mr. Harrison:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Flection Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anne R. Taylor
1304 John St.
Baltimore, MD 21217

RE: MUR 1158

Dear Ms. Taylor:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Salisbury
1909 Forest Park, Apt. T-3
Baltimore, MD 21207

RE: MUR 1158

Dear Mr. Salisbury:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Radcliffe
3215 North Charles St., Apt. 206
Baltimore, MD 21218

RE: MUR 1158

Dear Ms. Radcliffe:

The Federal Election Commission established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena and order which requires you to appear as a witness and give sworn testimony and other evidence has been issued.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits any person from making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this matter.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of the deposition.

If you have any questions please direct them to Kevin H. Smith, the attorney handling this matter, at (202) 523-4529. Please call Mr. Smith upon receipt of this letter and accompanying subpoena to confirm your attendance at the deposition.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena and Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter Parker, Esquire
700 Keyser Building
Baltimore, MD 21202

RE: MUR 1158

Dear Mr. Parker:

On February 19, 1980, the Federal Election Commission notified your client, Ms. Debra Hanania Freeman, that the Commission had reason to believe Ms. Freeman may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). The Commission has issued a subpoena and order requiring Ms. Freeman to appear as a witness and give sworn testimony and other evidence. Copies of these documents are enclosed for your information. The originals are being served upon your client.

If you have any questions, please direct them to Kevin H. Smith, the attorney handling this matter at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosures (2)

Copy of subpoena and order
Copy of letter to Debra Hanania Freeman

HCC 945

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, Maryland 21210

April 3, 1980

Mr. Kevin H. Smith
Office of the General Counsel
Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Re: MUR 1158

Dear Mr. Smith:

This is to inform you that Mr. Robert Prem is no longer representing me in the above matter. Mr. Prem was forced to withdraw from the case as a result of illness.

Please be informed that I am now being represented by Mr. Peter Parker, Keyser Building, Calvert and Redwood Streets, Baltimore, Maryland 21201. Mr. Parker's telephone number is 301-752-2131.

I hereby authorizedyou to communicate directly with him on all matters concerning this case.

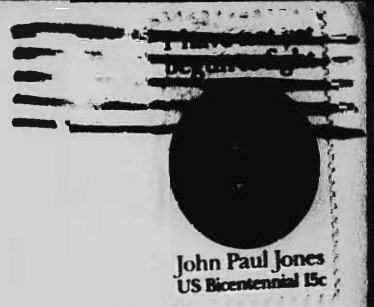
Sincerely,

Debra Hanania Freeman

cc: Peter Parker

10 APR 7 P10:36

D.H. Freeman
4004 Linkwood Rd.
Balto. Md. 21210



Mr. Kevin H. Smith
Office Of the General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

83107170

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

CERTIFICATE OF COMPLIANCE WITH THE RIGHT
TO FINANCIAL PRIVACY ACT OF 1978

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

From: Federal Election Commission

I hereby certify that the applicable provisions of the Right to Financial Privacy Act of 1978, 12 U.S.C. §§ 3401-3422, have been complied with as to the attached Subpoena Duces Tecum for the following financial records of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, except for those records specifically identified as pertaining to transactions of Lawrence K. Freeman:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and Lawrence K. Freeman from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Specifically, these records are being sought through the procedure provided in 12 U.S.C. § 3405.

Pursuant to the Right to Financial Privacy Act of 1978, good faith reliance upon this certificate relieves your institutuion and its emloyees and agents of any possible liability to the customer in connection with the disclosure of these financial records.

Date

Charles N. Steele
General Counsel
Federal Election Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert C. Prem, Esquire
929 North Howard Street
Baltimore, Maryland 21201

Re: MUR 1158

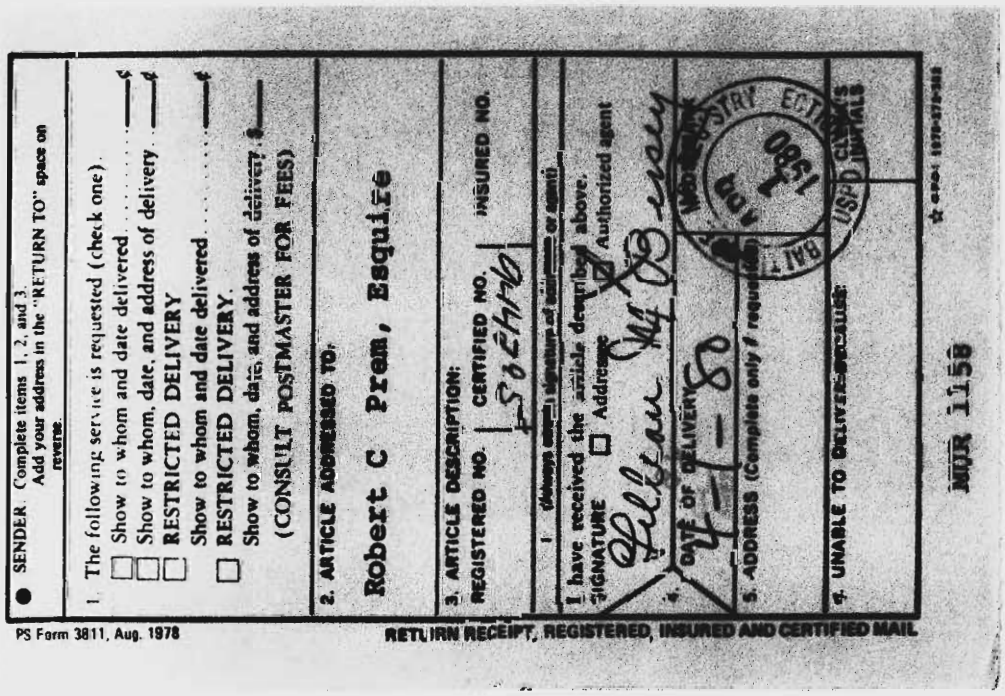
Dear Mr. Prem:

Debra Hanania Freeman has advised me that you will be representing her in connection with the above matter. Accordingly, I am enclosing a copy of a Right to Financial Privacy Act Notice with subpoena attached, which documents are being served upon your client.

Sincerely,

Charles N. Steele
General Counsel

Enclos
Righ
w



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert C. Prem, Esquire
929 North Howard Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Prem:

Debra Hanania Freeman has advised me that you will be representing her in connection with the above matter. Accordingly, I am enclosing a copy of a Right to Financial Privacy Act Notice with subpoena attached, which documents are being served upon your client.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Right to Financil Privacy Act Notice with subpoena attached

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Debra Hanania Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

> 1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.
>
> 2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.
>
> 3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

28 March 1980
Date

Charles N. Steele
General Counsel
Federal Election Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
P.O. Box 987
Baltimore, Md. 21203

RE: MUR 1158

Dear Mr. Ward:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of the Internal Revenue Code 1954, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena has been issued. The Commission does not consider either you or the bank a respondent in this matter and you are being subpoenaed as a witness only to testify and produce documents on behalf of the bank.

Since the attached subpoena is subject to the provisions of the Right to Financial Privacy Act of 1978, the deposition has been scheduled for a time and date beyond the period provided for a customer challenge to the subpoena. Depending upon the outcome of any such challenge which might be made, the date and time may have to be changed, the subpoena modified, or the deposition cancelled altogether. Unless you are notified of any such change, you should assume that the deposition will occur as scheduled. Prior to your answering any questions or producing any documents, you will be given a Certificate of Compliance certifying that the applicable provisions of the Right to Financial Privacy Act have been complied with and absolving the bank from any liability for actions taken in good faith reliance upon such certificate.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person to whom the investigation is being conducted. You are advised that no such consent has been given in this case.

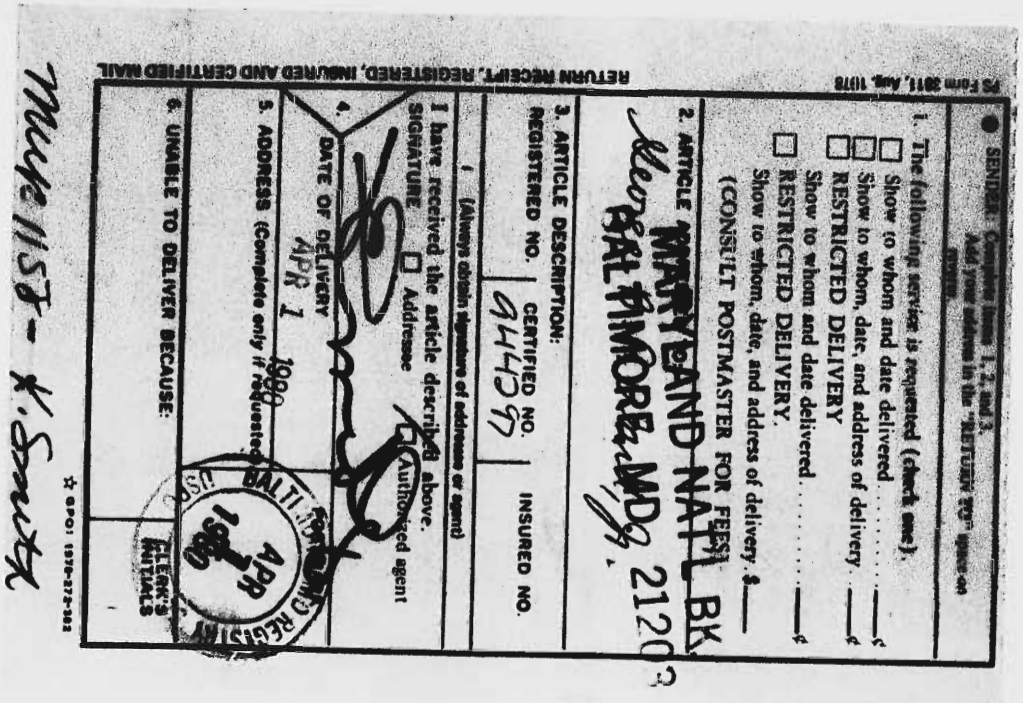
If you have any questions, please direct them to Kevin H. Smith, the attorney assigned to this matter, at 202/523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN)
)
Plaintiff,)
)
v.)
)
FEDERAL ELECTION COMMISSION)
)
Defendant.)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
P.O. Box 987
Baltimore, Md. 21203

RE: MUR 1158

Dear Mr. Ward:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of the Internal Revenue Code 1954, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena has been issued. The Commission does not consider either you or the bank a respondent in this matter and you are being subpoenaed as a witness only to testify and produce documents on behalf of the bank.

Since the attached subpoena is subject to the provisions of the Right to Financial Privacy Act of 1978, the deposition has been scheduled for a time and date beyond the period provided for a customer challenge to the subpoena. Depending upon the outcome of any such challenge which might be made, the date and time may have to be changed, the subpoena modified, or the deposition cancelled altogether. Unless you are notified of any such change, you should assume that the deposition will occur as scheduled. Prior to your answering any questions or producing any documents, you will be given a Certificate of Compliance certifying that the applicable provisions of the Right to Financial Privacy Act have been complied with and absolving the bank from any liability for actions taken in good faith reliance upon such certificate.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person to whom the investigation is being conducted. You are advised that no such consent has been given in this case.

If you have any questions, please direct them to Kevin H. Smith, the attorney assigned to this matter, at 202/523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Debra Hanania Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.

3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

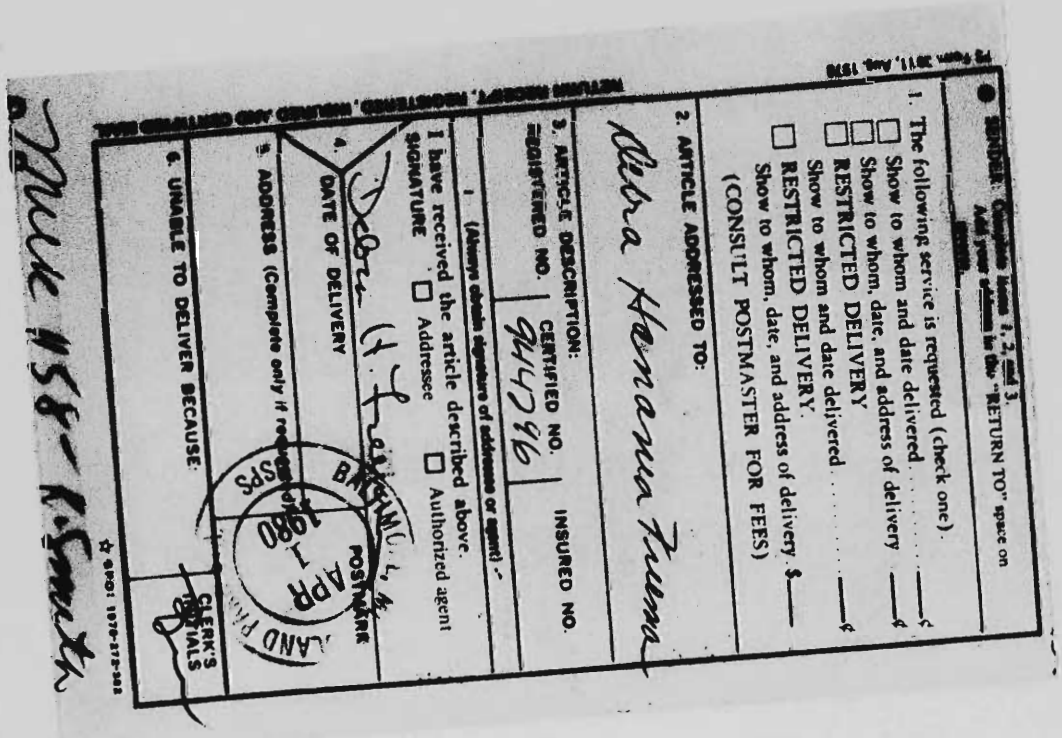
4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

28 February 1980
Date

Charles N. Steele
General Counsel
Federal Election Commission



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Lawrence K. Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

> 1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.
>
> 2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.
>
> 3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

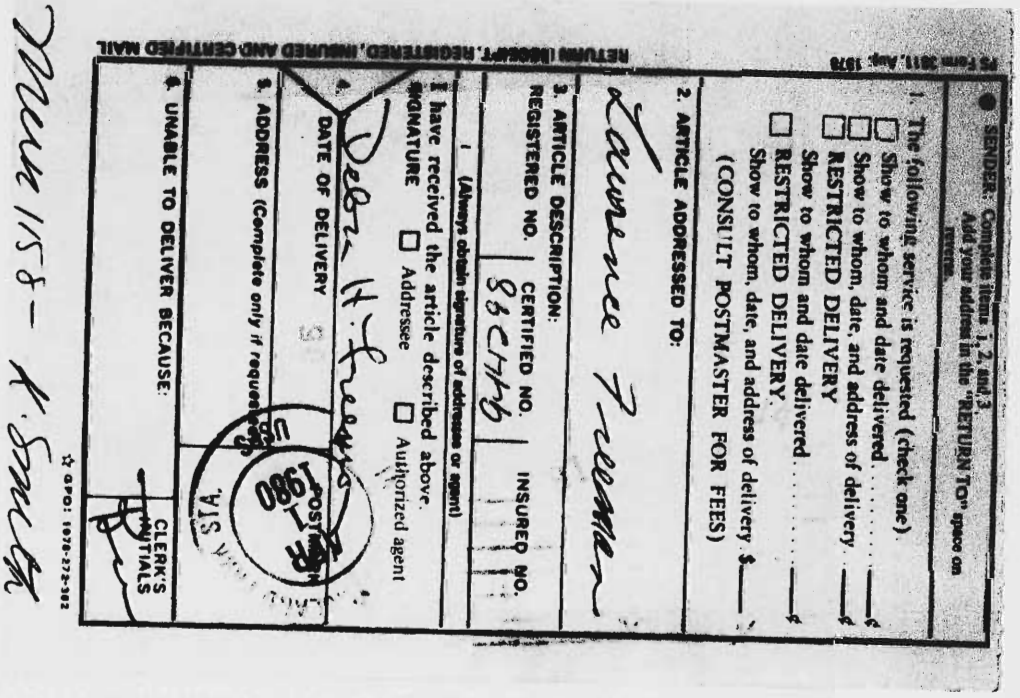
4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

28 March 1980
Date

Charles N. Steele
General Counsel
Federal Election Commission



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan
Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

LAWRENCE K. FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Lawrence K. Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: MARCH 27, 1980

SUBJECT: SUBPOENA IN RELATION TO MUR 1158

The attached subpoena, approved by a vote of 6-0 on March 27, 1980, has been signed and sealed this date.

ATTACHMENT:
Subpoena - Ward

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1158
Debra J. Hanania	)	
a.k.a. Debra Hanania Freeman	)	
a.k.a. Debra Hanania	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 27, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1158:

1. Authorize the subpoena to George B. P. Ward, Jr., Esquire, Vice President, Maryland National Bank, as attached to the Memorandum to the Commission dated March 20, 1980.

2. Authorize the General Counsel to send the letters and notices to Mr. Ward, Mr. Freeman, and Debra Hanania Freeman, as attached to the above-named memorandum.

3. Authorize the General Counsel to deliver the Certification of Compliance, as attached to the above-named memorandum, to the Maryland National Bank at such time as the notice provisions of the Right to Financial Privacy Act of 1978 have been complied with and the challenge period has expired or any challenges made have been resolved in favor of the Commission.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan,

Attest:

3/27/80
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 3-21-80, 10:13
Circulated on 48 hour vote basis: 3-21-80, 4:00

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE MWE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: MARCH 27, 1980

SUBJECT: REMOVAL OF OBJECTION TO MUR 1158

You were advised in a memorandum dated March 25, 1980 of an objection by Commissioner Reiche to MUR 1158.

Commissioner Reiche removed the objection at 11:30, this date, and cast an affirmative vote.

The certification of approval is attached.

A copy of Commissioner Reiche's memorandum is also attached.

ATTACHMENTS:
1. Certification
2. Memorandum

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 MAR 27 A11 : 30

MEMORANDUM:

TO: Marge Emmons, Commission Secretary

FROM: Commissioner Frank P. Reiche

DATE: March 27, 1980

SUBJECTS: MUR 1158

This is to notify you that I am withdrawing my objections to MUR 1158.

I wish to be recorded in favor of the staff recommendation.

Frank P. Reiche

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: MARCH 25, 1980

SUBJECT: OBJECTION - MUR 1158 - Memorandum to the Commission dated 3-20-80; Received in OCS 3-21-80, 10:13

The above-named document was circulated on a 48 hour vote basis at 2:00, March 21, 1980.

Commissioner Reiche submitted an objection at 4:43, March 24, 1980, thereby placing MUR 1158 on the Executive Session Agenda for April 10, 1980.

Attached is a copy of Commissioner Reiche's vote sheet with his comments.

ATTACHMENT:
Copy of Vote Sheet

March 21, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Please have the attached Memo distributed to the Commission on a 48 hour tally basis.

Thank you.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

RE: Authorization to Issue Subpoena in Connection with MUR 1158 (80)

Attached for Commission approval is a subpoena directed to the legal officer of Maryland National Bank in furtherance of our investigation in the above matter.

The documents sought by the subpoena and explanatory testimony by the legal officer will assist us in preparing for and conducting the depositions of Harold H. Harrison, David Sanders, Kevin Salisbury, Nancy Radcliff(e), and Debra J. Hanania (Freeman) and will be required in order for us to make the appropriate recommendations with respect to further action in this matter. This subpoena will be subject to the notice provisions of the Right to Financial Privacy Act of 1978.

The written questions previously submitted to the bank have been answered. The answers reveal that the "Harold H. Harrison" cashier's check was requested by Debra J. Hanania and was paid for with funds then on deposit in her savings account; she also received the cashier's check personally.

RECOMMENDATIONS

1. Authorize the attached subpoena to George B. P. Ward, Jr., Esquire, Vice President, Maryland National Bank.

2. Authorize the General Counsel to send the attached letters and notices to Mr. Ward, Mr. Freeman, and Debra Hanania Freeman, as indicated.

3. Authorize the General Counsel to deliver the attached Certification of Compliance to the Maryland National Bank at such time as the notice provisions of the Right to Financial Privacy Act of 1978 have been complied with and the challenge period has expired or any challenges made have been resolved in favor of the Commission.

Attachments

1. Authorization Form
2. Subpoena (1)
3. Right to Financial Privacy Act Notice to Debra Hanania Freeman (1) with copy of subpoena attached.
4. Right to Financial Privacy Act Notice to Lawrence K. Freeman (1) with copy of subpoena attached.
5. Letter to George B. P. Ward, Jr., Esquire (1)
6. Letter to Robert C. Prem, Esquire (1) with copies of Notice to Debra Hanania Freeman and subpoena attached.
7. Certificate of Compliance.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENA

The Commission hereby authorizes the issuance of a subpoena to the following person in connection with MUR 1158:

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
P. O. Box 987
Baltimore, Md. 21203

Robert O. Tiernan
Chairman

Thomas E. Harris
Commissioner

Max L. Friedersdorf
Vice Chairman

John W. McGarry
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at on and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this day of , 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

ATTACHMENT 2

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Debra Hanania Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

> 1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.
>
> 2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.
>
> 3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

ATTACHMENT 3

4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

Date

Charles N. Steele
General Counsel
Federal Election Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at on and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this day of , 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

2304737-2223

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Lawrence K. Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

> 1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.
>
> 2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.
>
> 3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

ATTACHMENT 4

4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

Date

Charles N. Steele
General Counsel
Federal Election Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at on and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this day of , 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

LAWRENCE K. FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Lawrence K. Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

3 3 7 1 3 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
P.O. Box 987
Baltimore, Md. 21203

RE: MUR 1158

Dear Mr. Ward:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of the Internal Revenue Code 1954, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena has been issued. The Commission does not consider either you or the bank a respondent in this matter and you are being subpoenaed as a witness only to testify and produce documents on behalf of the bank.

Since the attached subpoena is subject to the provisions of the Right to Financial Privacy Act of 1978, the deposition has been scheduled for a time and date beyond the period provided for a customer challenge to the subpoena. Depending upon the outcome of any such challenge which might be made, the date and time may have to be changed, the subpoena modified, or the deposition cancelled altogether. Unless you are notified of any such change, you should assume tha the deposition will occur as scheduled. Prior to your answering any questions or producing any documents, you will be given a Certificate of Compliance certifying that the applicable provisions of the Right to Financial Privacy Act have been complied with and absolving the bank from any liability for actions taken in good faith reliance upon such certificate.

ATTACHMENT 5

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person to whom the investigation is being conducted. You are advised that no such consent has been given in this case.

If you have any questions, please direct them to Kevin H. Smith, the attorney assigned to this matter, at 202/523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert C. Prem, Esquire
929 North Howard Street
Baltimore, Maryland 21201

Re: MUR 1158

Dear Mr. Prem:

Debra Hanania Freeman has advised me that you will be representing her in connection with the above matter. Accordingly, I am enclosing a copy of a Right to Financial Privacy Act Notice with subpoena attached, which documents are being served upon your client.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Right to Financial Privacy Act Notice
with subpoena attached

ATTACHMENT
6

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

RIGHT TO FINANCIAL PRIVACY ACT NOTICE

To: Debra Hanania Freeman

Records or information concerning your transactions held by the financial institution named in the attached subpoena or summons are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, in connection with various contributions purportedly made to Citizens for LaRouche by various individuals.

If you desire, that such records or information not be made available, you must:

> 1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.
>
> 2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the State of Maryland.
>
> 3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

4. Be prepared to come to court and present your position in further detail.

5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

Date

Charles N. Steele
General Counsel
Federal Election Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at on and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this day of , 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

1 3 0 1 0 3 7 1 3 4 1

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

CERTIFICATE OF COMPLIANCE WITH THE RIGHT
TO FINANCIAL PRIVACY ACT OF 1978

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

From: Federal Election Commission

I hereby certify that the applicable provisions of the Right to Financial Privacy Act of 1978, 12 U.S.C. §§ 3401-3422, have been complied with as to the attached Subpoena Duces Tecum for the following financial records of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and Lawrence K. Freeman:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and Lawrence K. Freeman from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Specifically, these records are being sought through the procedure provided in 12 U.S.C. § 3405.

Pursuant to the Right to Financial Privacy Act of 1978, good faith reliance upon this certificate relieves your institutuion and its emloyees and agents of any possible liability to the customer in connection with the disclosure of these financial records.

_____ _____
Date

Charles N. Steele
General Counsel
Federal Election Commission

ATTACHMENT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN)
)
Plaintiff,)
)
v.)
)
FEDERAL ELECTION COMMISSION)
)
Defendant.)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

LAWRENCE K. FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

LAWRENCE K. FREEMAN)
)
Plaintiff,)
)
v.)
)
FEDERAL ELECTION COMMISSION)
)
Defendant.)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Lawrence K. Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

DEBRA HANANIA FREEMAN	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
	)
Defendant.	)

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Plaintiff Freeman, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by defendant Federal Election Commission and, in support thereof, deposes and says as follows:

1. I am a customer of the Maryland National Bank from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to my transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, plaintiff moves the court to enter an order quashing the attached subpoena.

_____
Debra Hanania Freeman
[sign in presence of notary public]

[use this space for
notary stamp]

RECEIVED
CCF
909
80 APR 2 PM 12:05

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, Maryland 21210

March 27, 1980

Mr. Charles Steele
General Counsel
Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

007238

Re: MUR 1158

Dear Mr. Steele:

On February 21, 1980 I received a letter from the General Counsel's office advising me that the FEC had found reason to believe that I may have violated 2 U.S.C. S 441f and 26 U.S.C. S 9042(c)(1)(A). A report was attached.

On February 26 I answered that letter. At that time I stated that I had obtained legal counsel but that since I had, to the best of my knowledge neither directly submitted nor caused anything to be submitted to the Commission, that I was at a loss to comprehend the internally generated memorandum. I suggested a meeting to take place in the office of my attorney.

Since that time, I have received no response whatever from the Commission nor has my attorney. My attorney, Mr. Robert Prem, is now ill. Marsha Gentner and Kevin Smith have both refused to speak to me.

I strongly object to this entire affair. I am trying to cooperate with any investigation you may wish to carry out, however, I have a right to know how the Commission plans to proceed, particularly if I am to offer information and facts in my own defense. If my attorney is ill, and the office of the General Counsel refuses to speak to me, I am at a complete loss as to how I am to do this.

I would appreciate your prompt response to this matter.

Sincerely,

Debra Hanania Freeman

cc: Robert C. Prem

80 APR 2 P3:10

5-61

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 $250.00

AMOUNT

SUBJECT TO CONTRACT PREPARED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARIBAULT

Irene Radcliff

PURCHASER, SIGNER FOR DRAWER

3215 N Charles - Balto 21218

PURCHASER'S ADDRESS

:091900533: 189 2926722" 40

Benjamin F. Raney
Vivien I. Raney
1324 S. Charles St.
Baltimore, Md. 21230

MAR 08 1979

258
226

March 3 1979 7-7301/2520-30

Pay to the Order of Citizens for LaRouche $25.00

Twenty-five + 00/100 Dollars

PROVIDENT SAVINGS BANK
BALTIMORE, MD. 21201

For

Benjamin F. Raney

Benjamin F. Raney
Vivien I. Raney
1324 S. Charles St.
Baltimore, Md. 21230

SEP 6 1979

359

1-31 1979 7-7301/2520-30

Pay to the Order of C. L. L. $10.00

Ten + 00/100 Dollars

PROVIDENT SAVINGS BANK
BALTIMORE, MD. 21201

For

Benjamin F. Raney

502

NANCY RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE MD. 21218

NO. 234

December 3 19 79 7-89 520

PAY TO THE ORDER OF CFL $ 20 00

Twenty and 00/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy Radcliffe

12-11-79 1,1

B.d.t NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE, MD. 21218

NO. 235

December 9 19 79 7-89 520

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty Five and NO/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy B. Radcliffe

January 21,1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Sobieraj
(signature)

1909 FOREST PARK AVE. T-3
(address)

BALTIMORE MARYLAND
(City) (state)

12-11-79 1-1

S-02

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1166

9 Dec 1979

7-16
520

Pay to the order of Citizens Sav & Loan Bank $ 200-

Two hundred and -/- Dollars

maryland national bank
BALTIMORE, MARYLAND 402

Memo _____ Debra J. Hanania

10/11/79 1-1

5-10

THOMAS M. OLSEN
SAKIKO N. OLSEN
7916 Springway Road
Towson, Maryland 21204

1663

8 Dec 1979

7-11/520 39

To the order of Citizens for LaRouche $ 22.00

Twenty-Two and Zero Hundredths Dollars

First National Bank of Maryland BALTIMORE

Memo _____

Thomas M. Olsen

12-4-79, 1-1

AMERICAN EXPRESS MONEY ORDER 23-1/1020

55-466,938,124

PAY THE SUM OF
NOT OVER $[illegible]

DATE 12-4-79 THE SOUTHLAND CORP.

TO THE ORDER OF Citizens for LaRouche

Edward K. Fields

SIGNATURE AND ADDRESS OF BUYER

James B. Johnson
CHAIRMAN

BEFORE CASHING READ NOTICE ON BACK

1:2020=000 2:55 =1:56738424 0=

DATE 1/9/80 DEPOSIT CODE 1-1

AMERICAN EXPRESS MONEY ORDER

23-1
1020

55-467,316,467

Balt

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 84 SUM 25 DOLLARS 00 CTS

TO THE ORDER OF Citizens For LaRouche

James D. Robinson
CHAIRMAN

David Sanders 613 St. Ann St. Balt. Md. 21218
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders.

AMERICAN EXPRESS COMPANY ISSUER

⑈1020⑈000⑆55 ⑈467316467⑆

5-02

MD

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

DATE 1-15-80 DEPOSIT CODE 1-2

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.
DRAWER WITHOUT RECOURSE IN CASES STATED ON REVERSE

DATE Jan 12 1980 7553/919

PAY TO THE ORDER OF Citizens for Salisbury

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3857 7 5 5 1 1 0 0 0

AMOUNT SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FAIRBAULT

Kevin Salisbury 1909 N Forest Pk Ave

PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

⑆091900533⑆189 2957627⑈ 90 Baltimore MD

DATE 1-15-80 DEPOSIT CODE 1-2

MD

January 22, 1980
(date)

I contributed $ 1,009.58 to Citizens for Larouche on

January 22, 1980
(date)

signed

David Sanders
(signature)

613 S. Ann's Ave.
(address)

Baltimore, Md.
(City) (state)

house Sanders (spouse) David Sanders

Date 1/23/80 Code 1-3

Date 1/23/80 Code 1-3

For the use of Citizens for LaRouche

CITIZENS FOR LaROUCHE
CITIBANK

5-01

CITIZENS FOR BAROODHI
P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

Name of contributor Anne C Taylor
Address 1304 John St
City Balt State Md Zip
Amt. of contribution 150 —
Contributor's occupation retired.
Place of employment
Address
CFL Representative DHF/BH

AMERICAN EXPRESS MONEY ORDER 23-1 1020

11126

55-466,338,411

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 4/20 19 74 THE SUM OF ZERO DOLLARS

TO THE ORDER OF Citizens for Baroody

Gerald Ackerman CHAIRMAN

Anne C Taylor 1304 N. St Balt Md
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000⑈55 ⑈669384113⑈

5-01

ALAN L. CINSAVICH
2801-C COLDSTREAM WAY
BALTIMORE MD. 21234

NOV 14 1979

NO. 345

November 7, 19 79

7-89
520

PAY TO THE ORDER OF Citizens For LaRouche $ 50 XX/100

FIFTY AND NO/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

A. L. Cinsavich

MAY 4 1979

ALAN L. CINSAVICH
2801-C COLDSTREAM WAY
BALTIMORE, MD. 21234

NO 315

April 29, 19 79

7-89
520

PAY TO THE ORDER OF Citizens For LaRouche $ 15.00

FIFTEEN AND NO/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

A. L. Cinsavich

AMERICAN EXPRESS MONEY ORDER

23-1
1020

NOV 14 1979

55-466,938,402

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 13 19 79 ONE SUM TO DOLLARS AND CTS

TO THE ORDER OF Citizens for LaRouche

Jim Adams
CHAIRMAN

Charles Clark 14 North Hilton St. Baltimore Md.
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Balt

⑈1020⑈000 ⑆1:55 ⑈4669384023⑈

DR. DEBRA J. HANANIA
[redacted] Linkwood Road
Baltimore, Maryland 21210

997

19 [redacted] 7-16 / 520

Pay to the order of [illegible] $ [illegible]

[illegible] Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 19 77 7-16 / 520

Pay to the order of Citizens for LaRouche $ 50.00

fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo Bail Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO. 999

7-16 / 520

4 Dec 19 77

Pay to the order of Citizens for LaRouche $ 40.00

forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

Feb 1 19 89

7-16
520

Pay to the order of Calvert School $ 15.00

Fifteen and 00/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo _____

Debra J. Hanania

GCC#
760

File No. 18960

Docket 19 75

Page 387

In the Court of Common Pleas

Of Baltimore City

[redacted]

SAUNDRA E. BANKS, CLERK

January Term, 1980

GRENVILLE B. WHITMAN

VS.

U.S. LABOR PARTY

PHOTO-STAT

Plaintiff's Cost, - - - $ 41.50

Deft's Cost, - - - - - $

PAID

MAR 14 1980

SAUNDRA E. BANKS, CLERK

PER

S36994

2000-7-77

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN :

Plaintiff :

vs. : 1975/387/18960

U. S. LABOR PARTY :

Defendant :

Baltimore, Maryland

July 11, 1979

The above-captioned matter came on for Supplementary Proceedings, before The Honorable PAUL REED, JR., Law Commissioner, in Room 328, Civil Courts Building, commencing at 1:43 o'clock p.m.

A P P E A R A N C E S

PHILIP L. MARCUS, ESQ., on behalf of the Plaintiff.

DAVID B. MITCHELL, ESQ., on behalf of the Defendant.

C O N T E N T S

WITNESS	DIRECT	CROSS
GEORGE PANOS	15	17
DEBRA HANANIA-FREEMAN	20	--
ROBERT PRIMACK	83	--
LAWRENCE FREEMAN	104	--

E X H I B I T S

NUMBER	MARKED
1	16
2	37
3	41
4	67

- 0 -

PROCEEDINGS

THE COURT: We will call the case of Grenville B. Whitman versus U. S. Labor Party, in the Court of Common Pleas, Baltimore City. The case reference is 1975/387/18960.

Petition in Supplementary Proceedings was filed -- well, in the absence of a date, we will say that the Petition for Supplementary Proceedings was duly filed, subpoenaing Debra Freeman, Lawrence Freeman, Robert Primack, George Panos and Steven Warm.

Debra Freeman and Robert Primack were served May 10th, 1979. Lawrence Freeman was served on May 28th, 1979, and George Panos was served on July 2nd, 1979. Steven Warm, non est.

Now, will counsel for the parties identify yourselves for the record?

MR. MARCUS: Philip Marcus, representing the Plaintiff.

THE COURT: The Plaintiff, Grenville B. Whitman.

And for the Defendant, U. S. Labor Party?

MR. MITCHELL: David B. Mitchell.

THE COURT: Are there any other attorneys present?

MR. MITCHELL: Not that I am aware of as far as this case is concerned, Your Honor.

THE COURT: Okay. Let me ask, Mr. Marcus, what will be the thrust of your interrogation in this? There seems to be quite a few people involved, and there is a $30,000 judgment involved. Anything paid on the judgment, by the way, any money?

MR. MARCUS: Paid on it? Not to my knowledge, no.

THE COURT: Okay.

MR. MARCUS: The thrust is to find out where their assets are.

THE COURT: Whose assets?

MR. MARCUS: The U. S. Labor Party's.

THE COURT: And in doing that, will you require looking into records, going through records?

MR. MARCUS: Well, I have requested that records be produced. I am given to understand, unofficially, that there are no records.

THE COURT: Well, let's hear from counsel for the Defendant. Have the records been produced as ordered?

MR. MITCHELL: The records have not been produced,

and the reason why they have not been produced is because it has been our contention, as you can see from the pleadings that we filed already in this matter in an attempt to quash the subpoena as far as Mrs. Freeman is concerned, and Mr. Primack, is that they are not authorized officers, or had no control over any records or booksthat they could produce with regard to this organization. It's an unincorporated association, and they were members of the association. They hold no office in the association nationally, and therefore have no records of the association nationally.

With regard to Mr. Freeman, number one, Mr. Freeman was only recently served on the 28th of May by the record of the Court, and I would point out to the Court that Mr. Freeman is not under any requirement to produce these records since the order of the Court itself indicated that service is beyond the time, and therefore the summons is invalid.

THE COURT: What do you mean the service is beyond the time?

MR. MITCHELL: The order of the Court required that Mr. Freeman be served on or before May 23, 1979. The

Court records indicate that service was made on Mr. Freeman on May 28th, 1979.

MR. MARCUS: May it please the Court, there were reissues, and I think --

MR. MITCHELL: The reissues were as to Mr. Warm.

MR. MARCUS: That is not correct. See, if he --

THE COURT: Go ahead. What were you going to say?

MR. MITCHELL: In addition to that, the individuals, Mr. Freeman himself, if service is somehow valid as far as he is concerned, Mr. Freeman serves only as a committeeman, and testimony will be produced to show that he is only a committeeman, one of forty individuals nationally who serve as committeemen for this organization. And he has no control over its records or books. He never has been a financial officer, and never has been involved in nor had any authority over the finances. He has no responsibility for these areas, and therefore he could not produce these records. Additionally--

THE COURT: Let's take them one at a time.

MR. MITCHELL: All right.

THE COURT: I notice that there has been some testimony here, dated September 6, '77, before Judge Grady --

MR. MITCHELL: That was the trial of the proceedings, and Mr. Marcus in response to my petition to quash --

THE COURT: To what?

MR. MITCHELL: To quash service on Mrs. Freeman and Mr. Primack.

THE COURT: What did Judge Grady decide, without me going through this whole file?

MR. MITCHELL: Judge Grady was the Trial Judge in the matter, and the excerpt of the transcript that you have before you refers to testimony that came out in the trial. Mr. Marcus excerpted that portion of the transcript in his answer to our petition to quash, saying that the individuals that we alleged in our petition were not officers or responsible persons financially to the association, he excerpted that to say that they were. The Hearing was held before Judge Sodaro on whether the petition to quash should be granted, and he denied the motion, requiring we be present to testify today.

THE COURT: There are no motions before me at this time.

MR. MITCHELL: Not as to these two individuals.

THE COURT: Do you have a motion with respect to Lawrence Freeman?

MR. MITCHELL: Yes.

THE COURT: And your motion is based on the fact that he was not an officer and did not have --

MR. MITCHELL: No, the motion to quash the subpoena served on Mr. Freeman is based upon the Court's recitation -- as a matter of fact, the order of the Court itself, which indicates --

MR. MARCUS: Your Honor, if the Court please, I am going to object to the untimely making of a motion at this proceeding. I'm not even sure Your Honor has the authority to quash summonses, quite frankly.

THE COURT: I do.

MR. MARCUS: If you do, then I don't think this is the proper time. I think it would have been proper to file a motion in due course.

THE COURT: Well, if he had filed a motion, I have authority to rule on it.

MR. MARCUS: He hasn't filed it.

THE COURT: (Continuing) Then if he wants to appeal my decision, he can do so.

MR. MARCUS: But he hasn't filed it.

MR. MITCHELL: The order of the Court indicates that the order was signed on the 3rd day of May, 1979, commanding that these persons be served, and bring and produce --

THE COURT: Where is that order that you are referring to? I have an affidavit of service on the 30th day of May, 1979, declaring that under the penalties of perjury, that Kenneth McElroy was over eighteen years of age and not a party to this action; that on May 28th, 1979, at about 11:00 p.m., he served Lawrence Freeman with copies of the Petition and Order for Supplementary Proceedings to be held on July 11, 1979.

MR. MITCHELL: If I might, Your Honor, by going to the Court's files, the original Petition for Supplementary Proceedings filed with this action, included an order of Court dated May 3, 1979, commanding service be made upon the parties by the 23rd day of May, 1979.

THE COURT: All right, okay.

Well, are you saying that if service would then again be made, if there be a reissuance, and then we bring Mr. Lawrence Freeman back in on another date, at that time would you also object to him with respect to the order contained in the Petition for Supplementary Proceedings, requesting him to -- ordering him to produce documents, papers, et cetera, of the U. S. Labor Party?

MR. MITCHELL: If those things did take place and he was subpoenaed to be present at some other time, we would contend --

THE COURT: You would stick to your contention?

MR. MITCHELL: Yes, sir. And also --

THE COURT: Isn't it really undue delay here, and if I would deny your motion because the service was not obtained within the prescribed time of the order, you would still object to him --

MR. MITCHELL: Yes, I would.

THE COURT: So, then, if I would overrule your objection and he would take the stand, then he would only testify to what you told me, that he has no records?

MR. MITCHELL: That is correct, and he is not privy

to any records or --

THE COURT: So what is the motion before me?

MR. MITCHELL: One, that service upon Mr. Freeman is beyond the time as indicated by the order of the Court, and that there has been no extension that I saw in the file. Perhaps I might have missed it, but I didn't see anything in the file extending as to Mr. Freeman. There was an extension for Mr. Warm.

THE COURT: I am going to deny that motion.

MR. MITCHELL: The second motion is that --

THE COURT: With respect to Mr. Freeman?

MR. MITCHELL: Yes. (Continuing) -- that he has no records to produce and bring before the Court, and he is not a proper party to produce those records as he only serves in the capacity of national committeeman.

THE COURT: I will deny that motion.

MR. MITCHELL: The third one would be for a protective order. If these records that we are talking about producing from a national organization, if Plaintiff wants these records brought in, they should be required to post some kind of bond or some kind of cost to pay for the

expenses involved in making reproduction of these documents.

THE COURT: We will cross that bridge when we come to it. I will have to deny that third motion, because it's actually moot. At this time it's premature.

MR. MITCHELL: Yes, sir.

THE COURT: Because I already denied the first motion.

MR. MITCHELL: Yes, sir.

THE COURT: So we will cross that bridge when we come to it.

Now, any other motions to dispose of?

MR. MITCHELL: No.

THE COURT: How long do you think this is going to take?

MR. MARCUS: I guess an hour to an hour and a half, and it really is a guess.

THE COURT: Well, I will say to you -- I can usually tell as it goes along how long it is going to take -- but we will stop at 4:00 o'clock regardless. Unless the room gets too hot and it becomes unbearable, then I'll use my discretion.

Call your first witness.

MR. MARCUS: First of all, let's --

THE COURT: First, let me say this to you. We don't have to worry about leading questions and what-have-you. We can get right to the point. We are not before a jury, so you are not trying to impress anyone. I am only here to rule on admissibility of the evidence that you are trying to get to. So no one is going to impress me or not impress me. So we don't have to be orators and all that sort of thing. Let's really get the job done and get it over with.

MR. MARCUS: Okay.

THE COURT: And if there are things that I don't think should be answered, or if I think there is an improper question, I will then sustain the objection, even though counsel may not make the objection. All right?

MR. MITCHELL: All right.

MR. MARCUS: Yes, sir.

THE COURT: Call your first witness.

I know that you have a lot of preliminary information, do you not?

MR. MARCUS: I do, yes.

THE COURT: That has already been testified to,

and unless you feel that it's necessary to go through with that to lay some groundwork, then we can dispense with it. We should really get to the meat of what you want.

MR. MARCUS: I will try to get to that.

I guess I do have in a sense a preliminary motion. I would request that the witnesses be sequestered. I think you can rule --

THE COURT: Motion granted.

MR. MITCHELL: The only problem with that, Mr. Freeman as an officer of a party is entitled to be present. Mrs. Freeman and Mr. Freeman.

THE COURT: How about Mr. Panos?

MR. MARCUS: I am going to call him first.

THE COURT: Are you an officer, Mr. Freeman?

MR. FREEMAN: A member of the national committee.

THE COURT: Then you are just a committee member?

MR. FREEMAN: Yes, but that is one of the two executive bodies of the U. S. Labor Party.

MR. MITCHELL: Then he should be outside.

(Thereupon, the prospective witnesses left the courtroom.)

MR. MITCHELL: Off the record.

(Discussion off the record.)

MR. MARCUS: Mr. Panos, take the stand, please.

Thereupon --

GEORGE PANOS

a Witness, produced for oral examination on call of the Plaintiff, having been first duly sworn by the Notary Public, was examined and testified as follows:

THE COURT: Give us your full name.

THE WITNESS: My name is George Louis Panos.

THE COURT: Your address?

THE WITNESS: 10706 Cardington Way, Cockeysville, Maryland.

THE COURT: Okay.

DIRECT EXAMINATION

BY MR. MARCUS:

Q Mr. Panos, you are employed by The Hammerman Organization?

A Yes.

Q And that company is the landlord at the Medical Arts Building here in Baltimore City?

A That is correct.

Q And one of the tenants of that building is the U. S. Labor Party; is that correct?

A Yes.

Q Have you brought with you pursuant to the subpoena a copy of the lease and the credit application with regard to that tenancy?

A Yes.

MR. MARCUS: Would you hand those to the Court Reporter to be marked, please?

Do you have any objection if he puts in photocopies?

MR. MITCHELL: Absolutely not.

(The document was marked Plaintiff's Exhibit No. 1.)

MR. MARCUS: I have no further questions.

I don't know whether you are entitled to ask any. Is he entitled to cross-examination?

THE COURT: Oh, yes.

CROSS-EXAMINATION

BY MR. MITCHELL:

Q Mr. Panos, just one or two questions. You indicated in answer to Mr. Marcus' question that the tenant involved is the U. S. Labor Party; is that correct?

A Technically, yes. It was a different name on the lease.

THE COURT: What do you mean by technically?

THE WITNESS: It was a different name on the lease, Your Honor.

THE COURT: What is the name on the lease?

THE WITNESS: I believe it's Campagner Publications, Inc.

Q (By Mr. Mitchell) That is the tenant on the lease?

A Right.

Q So it's not U. S. Labor Party?

THE COURT: Who paid you the monthly rent or the yearly rental?

THE WITNESS: I believe that the tenant on the lease, but then we found out that the tenant on the lease has many different names. One was U. S. Labor Party, and also

the Baltimore Labor Party. This we learned after the fact when we leased them the space.

MR. MARCUS: Do you know the name of the individual who arranged to rent the property?

THE WITNESS: Mr. Freeman negotiated the lease with my rental agent in that building.

MR. MARCUS: I'm sorry. I'm sorry.

MR. MITCHELL: We are very informal; no problem.

Q (By Mr. Mitchell) Has the rent been timely paid?

A Yes.

Q Cash or check?

A Check.

Q Checks on whom -- whose check?

THE COURT: Please speak up. I have to hear you, too.

Q (By Mr. Mitchell) Whose check?

A I believe the name of the company that is on the lease.

Q New Solidarity International Press Service?

A Right.

THE COURT: Who is it?

MR. MARCUS: It says New Solidarity International Press Service, Incorporated.

THE COURT: Are they still tenants?

THE WITNESS: Yes, sir.

THE COURT: When was the last time they made a payment for the rental under this lease?

THE WITNESS: They should have paid their rent that was due July 1st.

MR. MARCUS: Did they?

THE WITNESS: To the best of my knowledge they did.

MR. MARCUS: That was the first rent, wasn't it?

THE WITNESS: When does the lease begin?

MR. MARCUS: That is what it says. It says on the 1st of July it starts.

THE WITNESS: Then it's been paid.

THE COURT: All right, is that it?

MR. MARCUS: Yes, sir. No further questions.

MR. MITCHELL: No further questions.

THE COURT: You are excused, Mr. Panos.

(Witness excused.)

THE COURT: Next witness?

MR. MARCUS: Mrs. Freeman.

Thereupon --

DEBRA HANANIA-FREEMAN

a Witness, produced for oral examination on call of the Plaintiff, having been first duly sworn by the Notary Public, was examined and testified as follows:

THE COURT: State your name and address.

THE WITNESS: My name is Debra Hanania-Freeman, and I live at 4004 Linwood Road in Baltimore.

THE COURT: Are you married?

THE WITNESS: Yes, sir.

THE COURT: Then it's Mrs. Freeman. You are married to?

THE WITNESS: To Lawrence Freeman.

THE COURT: Okay.

DIRECT EXAMINATION

BY MR. MARCUS:

Q You are a member of the U. S. Labor Party?

A Yes.

Q Since when?

A Oh, since 19 -- well, since it was constituted in 1973.

THE COURT: Keep your voice up.

THE WITNESS: Since the Party was constituted, which was I believe in 1973.

MR. MARCUS: If you say so.

Q (By Mr. Marcus) Have you frequently attended meetings of the Party?

A Yes.

Q How often?

A Oh, I guess just about every time the Party has a meeting.

Q How often does it have a meeting?

A Well, we have formal meetings very rarely. As a matter of fact, I can't remember the last one.

Q When was the last informal meeting the Party had?

A Last night.

Q Were you there?

A Yes.

Q How about the one before that? When was the next previous informal meeting?

A Sunday.

Q And you were there?

A Umh-humh (nodding head affirmatively).

Q In fact, you go to almost every informal meeting, don't you?

A Oh, yes.

Q You are a member of the Baltimore Region of the Party; is that correct?

A Yes.

Q How many members approximately in the Baltimore Region?

A Well, it's kind of hard to say. We don't keep a membership list.

Q Why not? Why don't you keep a membership list?

MR. MITCHELL: Objection. That is not relevant, as to why they don't keep a membership list.

MR. MARCUS: I think under the circumstances, Your Honor, it is relevant because --

THE COURT: I am going to allow her to answer. If

no basis develops for it at a later time, then I will grant your motion and strike it from the record. You can answer.

A. I honestly don't know. There are no criteria for membership except a broad exchange of ideas. Anyone who agrees with the ideas can attend the meetings. All meetings are public.

THE COURT: Let me get something straight in my mind. The U. S. Labor Party, that is incorporated, is it not?

THE WITNESS: No, it's unincorporated.

THE COURT: Unincorporated?

THE WITNESS: As far as I know.

THE COURT: And what are its purposes and objectives?

THE WITNESS: Excuse me?

THE COURT: Its purposes and objectives.

THE WITNESS: It's a political party. We function primarily as an educational institution. We circulate ideas, talk with people, and try to convince people of our point of view.

THE COURT: Just like the Republican Party or the Democratic Party, et cetera?

THE WITNESS: Yes.

THE COURT: Okay. When you were talking about national committeemen and everything, I thought you were talking about a labor organization.

MR. MITCHELL: No. I'm sorry.

THE COURT: All right. Let me ask you this: When you have meetings, don't you notify the membership through mail?

THE WITNESS: No, we don't, just word of mouth.

THE COURT: Well, how many people do you usually have at a meeting?

THE WITNESS: Anywhere from three to fifty.

THE COURT: Suppose you were going to hold a convention?

THE WITNESS: Well, we haven't held one, so I really can't answer that.

THE COURT: Well, suppose you would?

THE WITNESS: I suppose we might publish a leaflet or advertisement, or call people up. It wouldn't be my responsibility in any case, so I couldn't answer. I am only a member of the Party.

THE COURT: Well, I have been involved in political organizations through a number of years in the State, and we always kept a list of our members. And when we want them to appear because there may be -- we might have something involving the western portion of the State, and we wanted to have some idea as to what is going on, and we would call in our organization from that section. But we would know who to call. Do you know who to call?

THE WITNESS: I would call the people who generally share agreement with our ideas, but there is nothing such as a card-carrying member, if that is what you mean.

Q (By Mr. Marcus) How many people do you think in the Metropolitan Baltimore area right now share your ideas and come regularly to meetings?

A. If you want to know how many share our ideas, I would say probably thousands.

Q. And come regularly to meetings?

A. Fifty people.

THE COURT: That gets a little too general. A lot of people, like he says, may be sympathetic to their philosophy, that she doesn't even know about.

Q (By Mr. Marcus) But those who come regularly, you say there are about fifty of them?

A Right.

Q Who chairs the meetings, by the way?

A It varies.

Q Who chaired last night's meeting?

A There was no chairman last night.

Q Just a free-for-all?

A Yes.

THE COURT: What was the purpose of that meeting last night, to discuss this Hearing today?

THE WITNESS: No, discussing energy policies, discussing guidelines, actually.

THE COURT: So if you would have come to a conclusion and/or a solution to the energy problem, what would you have done following the termination of that meeting?

THE WITNESS: Well, we didn't reach a conclusion.

THE COURT: Assuming that you did.

THE WITNESS: We don't do anything. Just a common agreement. Basically it's an educational discussion for the people involved.

Q (By Mr. Marcus) Your husband, Lawrence Freeman, is the Chairman of the Maryland Party, isn't that correct?

A Yes, he is.

Q How long has he been the Chairman?

A You know, I really don't know. I suppose probably a couple of years.

Q Since before you were married?

A No.

Q You were at one time the financial officer of the Baltimore Region, weren't you?

A No, no. There is no financial officer.

Q Do you know that Mr. Primack testified under oath in court that you were the financial officer?

A He must have been mistaken.

Q You don't think he was lying, though?

A Oh, absolutely not.

Q But you think he was mistaken?

A (Nodding head affirmatively.)

THE COURT: How did this action arise in the first place?

MR. MARCUS: By the publication of a leaflet, which

is in one of the Court's files in the case.

MR. MITCHELL: It's a libel action, Your Honor, in which Mr. Whitman alleged libel against the U. S. Labor Party and certain members, and the matter went to trial before Judge Grady, and the jury awarded a verdict of $30,000 damages to Mr. Whitman, or in Mr. Whitman's favor, against the U. S. Labor Party only, and not the individuals.

Q (By Mr. Marcus) The headquarters of the Party is in New York City, right?

A Right.

Q What is the address?

A P. O. Box 1972.

Q That is not an address. Where is it located physically?

A That is the address. That is the address that I send mail to.

Q If I wanted to visit them, where would I go?

A I don't know. I guess you would have to call the number.

Q You are telling me you don't know the physical premises occupied by a political party of which you have been

a member since '73?

A. As far as I know, we don't rent any office.

THE COURT: You have to answer the question.

THE WITNESS: I can only answer it as far as I know.

THE COURT: The question is, are you saying now, having been a member since 1973, that you don't know where the offices of this Party are?

THE WITNESS: I know where to find the officers of the Party, but I don't know that we rent offices.

Q. (By Mr. Marcus) Then we will talk first about the officers of the Party, who are?

A. Mr. Lyndon H. LaRouche--

Q. What is his address?

A. I don't know his personal address.

Q. How about his office address?

A. When I want to communicate with him, I write to P. O. Box 1972.

Q. Have you ever been to 231 West 29th Street in New York City?

A. Not recently.

Q Have you ever?

A Yes.

Q Why did you go there when you did?

A Those are the offices of New Solidarity International Press Service.

Q Is it also the headquarters or offices of Campagner Publications, Inc.?

A It used to be.

MR. MITCHELL: Objection.

THE COURT: Overruled.

MR. MITCHELL: It has no relevancy.

THE COURT: Overruled.

THE WITNESS: It used to be.

Q (By Mr. Marcus) Not anymore?

A No.

Q Where is it now?

A Somewhere on 58th Street.

THE COURT: Let's find out whether any members of the U. S. Labor Party are members of that organization.

MR. MARCUS: I am going to.

Q (By Mr. Marcus) As a member of the Labor Party, you

have seen people handing out newspapers called New Solidarity on street corners and like that, right?

A. Right.

Q. In fact, on a street corner right near this building?

A. Right, yes.

Q. And they are members of the Labor Party?

A. Yes.

Q. And sell New Solidarity?

A. Yes.

Q. Published by Campagner Publications, right?

A. Yes.

Q. Did you ever sell copies of New Solidarity?

A. No.

Q. Do you know the names of anybody who does?

A. Yes.

Q. Can you tell me who?

MR. MITCHELL: Objection.

THE COURT: Overruled.

A. William Salisbury.

Q. (By Mr. Marcus) Where does he live?

A. He lives in Charles Village.

Q. Do you know any closer than that?

A. No. I'm sorry, I don't.

Q. You don't visit him?

A. I have visited him.

THE COURT: I can't hear.

Q. (By Mr. Marcus) You have never visited him at Charles Village?

A. I have visited him, but I don't know his address.

Q. Anybody else?

A. Arthur Murphy.

Q. Where does he live?

A. I believe he lives with Bill Salisbury, but I don't know the exact address. I'm sorry.

Q. Anyone else?

A. Let me think. Nancy Radcliffe.

Q. Where does she live?

A. Also in Charles Village.

Q. Where in Charles Village?

A. Somewhere around 33rd Street, I believe.

Q. Anyone else?

A. Belinda DeGrazia.

Q. Spell that.

A. D-e-G-r-a-z-i-a.

Q. And where does she live?

A. In Roland Park.

Q. Where in Roland Park?

A. Just north of University Parkway.

Q. You don't know the address?

A. No, I don't.

Q. All right. But you say you have never sold a paper?

A. No, not never. I just don't do it now.

Q. You have sold the paper in the past?

A. Yes.

Q. How much did you sell it for?

A. When I used to sell them, they were a dime.

Q. How much are they now?

A. Twenty-five cents.

Q. How many get sold in an average week in Baltimore?

A. I really don't know.

MR. MITCHELL: I am going to object at this point, Your Honor. The judgment is against the Labor Party, and not New Solidarity International Press Service.

THE COURT: I would like for you to try to tie in whether New Solidarity, whatever it is --

MR. MITCHELL: New Solidarity International Press Service.

MR. MARCUS: There are two names.

THE COURT: Let's try to tie it in with the U. S. Labor Party or these people individually.

MR. MARCUS: I know so far that the Labor Party members are selling this newspaper.

Q (By Mr. Marcus) You don't know how many copies they sell per week?

A I really don't know. I think Larry probably knows.

MR. MARCUS: All right, I will ask Larry.

Q (By Mr. Marcus) Now, the proceeds from the sales -- you say it's a quarter now?

A Yes.

Q What happens to the proceeds, the money you take

in?

A. We send them to New York to Campagner Publications.

Q. Send them bags of coins?

A. We wire it, usually, through Western Union.

THE COURT: Who wires it?

THE WITNESS: Whoever is in the office that night.

THE COURT: In whose office?

THE WITNESS: Well, New Solidarity International Press Service has that office.

THE COURT: With whom, with the U. S. Labor Party?

THE WITNESS: No, the U. S. Labor Party doesn't rent an office. Mainly the people are volunteers.

THE COURT: Is that the same address as is on the lease?

THE WITNESS: I didn't see the lease.

Q. (By Mr. Marcus) Is that in the Medical Arts Building?

A. Yes.

THE COURT: Is it the same address that is on the lease from Mr. Panos?

MR. MARCUS: It's supposed to be.

Yes, unh-hunh.

Q (By Mr. Marcus) Now, this, whatever it's called, New Solidarity International Press Service, Inc., did that also at one time have offices on St. Paul Street in Baltimore City?

A Yes.

Q About the 2600 block?

A 2500 block.

Q And the U. S. Labor Party also had offices there?

A Members of the U. S. Labor Party worked out of that office.

THE COURT: When you say they worked, you are saying that no, the U. S. Labor Party did not have offices, but members of the U. S. Labor Party worked out of that office. Now, what offices did the members of the U. S. Labor Party work out of?

THE WITNESS: Can I explain something to you?

THE COURT: No, no. Just answer the question.

THE WITNESS: Members of the U. S. Labor Party do all kinds of work. Some work at Johns Hopkins Hospital.

THE COURT: Okay, I understand that.

Q (By Mr. Marcus) I show you a piece of paper, actually about three or four stapled together.

MR. MARCUS: Let's mark that first for identification.

(The document was marked Plaintiff's Exhibit No. 2 for Identification.)

Q (By Mr. Marcus) Can you identify this page (handing)?

A Yes.

Q Have you ever seen that before?

A Yes.

Q Is your husband's name on there someplace?

A Yes.

Q And it says U. S. Labor Party?

A Yes.

Q And what is the address?

A 2539 St. Paul Street.

Q Which is the same address that you told the Judge was occupied --

A That is correct.

MR. MARCUS: I would like that received in evidence.

THE COURT: Let me look at that.

(Document handed to the Court by Mr. Marcus.)

MR. MARCUS: Will it be received in evidence?

THE COURT: Yes.

Q (By Mr. Marcus) So, in other words, the headquarters of the U. S. Labor Party until recently were at 2539 St. Paul Street?

A Yes.

Q Did you receive money there?

A Did the U. S. Labor Party receive money?

Q Yes.

A We don't receive any money.

THE COURT: Just answer the question. Who receives money for the U. S. Labor Party?

THE WITNESS: I don't know. As far as I know, I haven't received any money for the U. S. Labor Party.

THE COURT: You have not?

THE WITNESS: No. I can only tell you what I have done.

THE COURT: All right. Now, are there any accounts, bank accounts, checking accounts, in existence in the names of different individuals or organizations that are used to provide money for the U. S. Labor Party?

THE WITNESS: Not in Maryland.

THE COURT: Well, any place? We are talking about any place.

THE WITNESS: Well, I don't know what the situation is in other places. I know the U. S. Labor Party has a national treasurer.

THE COURT: It does?

THE WITNESS: Yes.

THE COURT: Where?

THE WITNESS: New York City.

Q (By Mr. Marcus) What is the fellow's name?

A It's a woman.

Q I apologize.

A (Continuing) Her name is Spannaus, S-p-a-n-n-a-u-s.

THE COURT: And she is the treasurer of what?

THE WITNESS: Of the U. S. Labor Party.

THE COURT: And she keeps the money of the

U. S. Labor Party?

THE WITNESS: Yes.

THE COURT: Does she give out annual reports or semiannual reports on the state of the treasury?

THE WITNESS: No.

THE COURT: Well, why is she the treasurer?

THE WITNESS: She was elected to be treasurer.

THE COURT: For what reason? It must be to take care of the property and assets of the U. S. Labor Party.

THE WITNESS: I guess that is what she does.

THE COURT: Do you know?

THE WITNESS: I don't know what she does.

THE COURT: Are you saying -- well, go ahead.

Q (By Mr. Marcus) Who paid for this printed leaflet?

A. I don't know.

Q Thousands of copies, it looks like.

A. I don't know how many copies.

Q Your husband signed this thing.

A. Why don't you ask him.

MR. MITCHELL: She doesn't know, but maybe her husband does.

THE COURT: Objection sustained.

Q (By Mr. Marcus) Has the U. S. Labor Party published any leaflets in Baltimore of late?

A I really don't know.

Q You go to every informal meeting, or practically every informal meeting, and don't know what it publishes?

A That's right.

THE COURT: When was the last one published that you know of?

THE WITNESS: I really don't know.

Q (By Mr. Marcus) Let me refresh your memory.

MR. MARCUS: Can I have this marked as No. 3 for Identification?

(The document was marked Plaintiff's Exhibit No. 3 for Identification.)

Q (By Mr. Marcus) I show you Plaintiff's Exhibit 3 marked for Identification. Do you recognize it?

A Yes, I recognize it.

Q When was it published?

A Right after Mr. Whitman attacked me.

Q Allegedly attacked you --

THE COURT: Allegedly did what?

THE WITNESS: He attacked me on May 28th.

MR. MARCUS: I won't go into that.

Q (By Mr. Marcus) That's about when it was published, then?

A. The next day or so.

Q How many copies were printed?

A. I don't know.

Q You wrote it?

A. Yes, I wrote it.

MR. MARCUS: May this be received in evidence?

THE COURT: Let me see it.

(Document handed to the Court by Mr. Marcus.)

Q (By Mr. Marcus) You don't know how many copies were run off?

A. I really don't.

Q You don't have any idea?

A. No.

Q Thousands?

A. No, I don't think so.

Q Five hundred?

A A few hundred probably.

Q How much was paid for that process?

A I don't know.

Q Who did the paying?

A I don't know.

Q You are a liar, aren't you?

MR. MITCHELL: Objection.

A No.

THE COURT: Sustained.

Q (By Mr. Marcus) Who got those materials printed on Plaintiff's Exhibit 3?

A I don't know. I wrote them and typed them.

Q Fine. What did you do with it after you finished typing it?

A I don't know. I went to work that evening.

Q You left it someplace?

A Left it on my desk.

Q Where was the desk that you left it on?

A At that time the desk was in the front room of the office at 2539 St. Paul Street.

Q You have no idea from then on how this got printed?

A No, I really don't.

Q Does the group of Labor Party members in Baltimore ever receive money from the national headquarters?

A No.

Q Never?

A No.

Q Does it ever send money up to New York?

A Not to the U. S. Labor Party. It does send money to New York.

Q To where?

A Campagner Publications.

Q Why?

A Because they publish literature and have a contractual agreement.

Q Where did you get the money to be used to purchase this material?

A It's sent to us from New York.

Q The money is sent to you from --

A No, the material is sent from New York.

Q Where do you get the money?

A I think that's done on the national level.

Q I don't understand that.

A Well, what happens is that once or twice a week we are sent literature from New York, what I believe is the case, and Larry would really have to clarify that. I believe the National U. S. Labor Party has a contractual agreement with Campagner Publications where we provide the ideas for certain materials which they print. Labor Party members volunteer to sell that material, because they want the ideas circulated. The money for that in turn goes to Campagner Publications, which publishes and pays for that material.

Q Where does the money come from?

A I don't know. You mean the money for the materials --

Q Yes.

A Oh, what we sell in the street.

Q So it's from proceeds of sales, then?

A What?

Q The money comes from proceeds of selling things?

A Yes, sure.

THE COURT: This is admitted into evidence.

Q (By Mr. Marcus) Who takes up the collection of money?

A Different people.

Q Being whom?

A Sometimes me. Whoever is around, really.

Q Where is that done physically?

A It's done at the office in the Medical Arts Building.

Q And you take bags of money down to the bank?

A Not to the bank, we take them to Western Union.

Q And you wire it to New York?

A Right.

Q Do you keep any record of the money that you send to New York?

A Yes, sure.

Q Who keeps those records?

A Different people each night keep them.

THE COURT: Different what?

THE WITNESS: We take turn each night, whoever happens to be around.

THE COURT: Do you have a central file, central ledger?

THE WITNESS: It's not a ledger.

THE COURT: Well, whatever.

THE WITNESS: Yes, there are files.

Q (By Mr. Marcus) Where are those files?

THE WITNESS: Can I ask you one question? because I want to make sure I am answering correctly.

MR. MARCUS: Go ahead.

THE WITNESS: Are you talking about files of U. S. Labor Party money?

Q (By Mr. Marcus) I am talking about, and I think the Judge is talking about, when you send money up to New York, you say you keep records of the money you send to New York.

A But that's not to the Labor Party.

THE COURT: You already testified to that. We know that.

Q (By Mr. Marcus) You do keep a record of the money that is sent up?

A Oh, yes.

Q Who keeps the record?

A We just put them in a big file cabinet.

Q Where is that big file cabinet?

A In our office.

Q In the Medical Arts Building?

A Right.

Q Who has a key to the file cabinet?

A It's not locked.

Q Who has a key to the office?

A Everyone.

Q Do you have one?

A Yes.

Q Have you brought with you today those records?

A No, I haven't.

THE COURT: Why not?

THE WITNESS: Because I was asked to bring with me records of the U. S. Labor Party, and they are not records of the U. S. Labor Party.

Q (By Mr. Marcus) May I ask you why they are not?

A Because the money does not get taken in or sent to the U. S. Labor Party.

THE COURT: Well, the U. S. Labor Party has an interest in this, doesn't it?

THE WITNESS: We have an interest in the ideas, no financial interest.

THE COURT: I mean, the Labor Party has an interest in money to promote their ideas.

THE WITNESS: We don't see the money, at least I don't as a member of the Labor Party.

THE COURT: Well, somebody in the Labor Party receives it.

THE WITNESS: As I said, I can't tell you anything about the financial affairs of the Labor Party. I think the only one that can is Ms. Spannaus. I don't know. I can't tell you something I don't know.

THE COURT: Did you have any participation in electing --

What's her name?

THE WITNESS: Ms. Spannaus.

THE COURT: (Continuing) -- as treasurer?

THE WITNESS: I voted for her.

THE COURT: Where was that election held?

THE WITNESS: Well, actually, the way the thing was held --

THE COURT: Just tell me where it was held.

THE WITNESS: I think it was held two years ago.

THE COURT: Where?

THE WITNESS: I didn't elect Ms. Spannaus. I elected the National Executive Committee of which she is a member, and I believe they elected her treasurer.

THE COURT: Where was that election held?

THE WITNESS: New York City.

THE COURT: Where did you stay when you went up there?

THE WITNESS: With my parents.

THE COURT: Where did the rest of the delegates stay?

THE WITNESS: Well, many of them live there. I don't know where they stayed.

THE COURT: And was that meeting held in a meeting hall?

THE WITNESS: Held in a high school.

THE COURT: High school. Who paid the expenses for

that meeting, travel expenses and whatever, if such expenses were paid?

THE WITNESS: We paid our own travel expenses.

THE COURT: And were you reimbursed in any way?

THE WITNESS: No.

THE COURT: And people came from far and wide?

THE WITNESS: Yes.

THE COURT: As far west as where?

THE WITNESS: California.

THE COURT: As far south as what?

THE WITNESS: Georgia.

THE COURT: As far north as what?

THE WITNESS: Canada.

THE COURT: And you went on your own expense money, or your money, and you were never reimbursed in any way, shape or form?

THE WITNESS: No, sir.

Q (By Mr. Marcus) Are you employed, Mrs. Freeman?

A Yes.

Q Where?

A I am employed at a private educational center,

the Stanley Kaplan Educational Center.

Q Where is that located?

A 32nd and St. Paul.

Q In Baltimore City?

A Yes.

Q What do you do for them?

MR. MITCHELL: Objection.

THE COURT: Overruled.

A I am a teacher.

MR. MITCHELL: It doesn't have any relevance to these proceedings?

THE COURT: Yes, it does. Overruled.

THE WITNESS: I am a teacher.

Q (By Mr. Marcus) Are you the only teacher for --

A For Stanley Kaplan?

Q Yes.

A Oh, no.

Q How many are there?

A Approximately?

Q Approximately.

A Stanley Kaplan is not connected with the U. S.

Labor Party in any way. I really don't know how many teachers there are.

Q How many other teachers are members of the U. S. Labor Party?

A None that I know of.

Q You receive a salary, then, from Stanley Kaplan?

A Oh, yes.

THE COURT: How much is the salary?

MR. MITCHELL: Objection to the Court's question as to the amount.

THE COURT: I would like to know. It has some relevancy, because she does a lot of traveling at her own expense, such as to New York to elect the treasurer of the U. S. Labor Party.

THE WITNESS: It varies, depending on how many classes I teach. I get paid an hourly wage of $15.00 per hour.

THE COURT: Is that a regular public school, or a private school?

THE WITNESS: It's an insitution that teaches preparatory courses for taking the Law Boards and Medical

Boards, the SAT, GMAT, those kinds of things.

THE COURT: Does your husband work there also?

THE WITNESS: No.

Q (By Mr. Marcus) Where does he work?

A New Solidarity International Press.

Q And he receives a salary from this service?

A Yes.

Q You don't know offhand now how much he gets?

A No, I --

MR. MITCHELL: Objection as to his --

MR. MARCUS: I will withdraw the question.

THE COURT: Sustained.

Q (By Mr. Marcus) Do you receive any salary or stipend or any form of periodic payments from the U. S. Labor Party?

A No.

Q How about from New Solidarity International Press Service?

A Yes.

Q How much?

A It varies.

Q How much did you receive last week?

A $85.00.

THE COURT: Last year?

THE WITNESS: Last week.

THE COURT: What did you receive last year?

THE WITNESS: I think about $2,500, but I'm really not sure.

Q (By Mr. Marcus) How about from Campagner Publications last year?

A No, nothing.

Q How about the National Caucus of Labor Committees?

A No.

Q You are a member of the National Caucus of Labor Committees?

A Yes, sir.

Q Who owns Campagner Publications, Inc., do you know?

A There is a Board. I really don't know who is on it.

Q How many members of the Board -- how many members

does that Board have?

A. I don't know.

Q. How many members are there on the Board that runs the U. S. Labor Party?

A. I don't know.

Q. Do you know any of the members of the Board that runs the Labor Party?

A. Of the Board? You mean the National Executive Committee?

Q. Is that what it's called?

A. Yes.

Q. Your husband is one of them?

A. No.

Q. Do you know any of the members?

A. Yes.

Q. How many members do you know?

A. All nine of them.

Q. How many of these also serve on the Board of Campagner Publications?

A. I don't know.

Q. Who runs the New Solidarity International Press

Service, Inc.?

A. I don't know the name of the person.

Q. Is it an individual?

A. I think it's a Board, but I don't really know.

Q. Do you know any of the people who are on the Board?

A. I'm really not sure.

Q. Well, you work for it, don't you?

A. Yes. I know people who are associated with it, but I don't know the form --

Q. Who? Name them.

A. Nancy Spannaus.

Q. The treasurer of the Labor Party?

A. Yes.

Q. Anyone else?

A. She is the only one I know for sure.

Q. Who hired you?

A. I wasn't really hired, I just have been down here for quite some time, and --

Q. That really doesn't answer the question. Somebody made a decision to pay you money to work.

A. Someone in New York made the decision. I really

don't know who.

Q Who informed you of the decision?

A Let me just think for a second.

Q Yes.

A I think Nancy informed me.

Q Nancy Spannaus?

A Yes, through my husband.

Q Now, the National Caucus of Labor Committees, how is that related to the U. S. Labor Party?

A The National Caucus of Labor Committees is a smaller organization of people who were brought together as a group in I believe 1968, and we functioned as such more or less for a number of years. Then in 1973 the U. S. Labor Party was formed.

Q By members of the National Caucus of Labor Committees?

A And by others. You see, every member of the U. S. Labor Party is not a member of the National Caucus of Labor Committees. As a matter of fact, the vast majority I would say of members of the U. S. Labor Party are not.

Q But every member of the National Caucus of Labor

Committees is a member of the U. S. Labor Party?

A That I don't know.

Q Or substantially all?

A Yes.

Q Now, Lyndon LaRouche is running for President of the United States in 1980?

A Yes.

Q There was no convention --

A (Continuing) He right now is running for the candidacy of the U. S. Labor Party. He hasn't been officially nominated.

Q He ran in '76, too, didn't he?

A Yes.

THE COURT: Has the U. S. Labor Party made a contribution to his campaign?

THE WITNESS: To Mr. LaRouche's?

THE COURT: Yes.

THE WITNESS: Not as far as I know.

THE COURT: Will they?

THE WITNESS: I don't think so.

Q (By Mr. Marcus) Why not?

A. I don't think they have any money to contribute.

Q. They don't have any money at all?

A. I don't think so.

Q. The U. S. Labor Party?

A. I really don't know. You will have to ask Nancy.

THE COURT: But they have access to money?

THE WITNESS: You will have to ask Nancy.

THE COURT: But do they have access to money that they can draw from different organizations?

THE WITNESS: Not that I know of.

THE COURT: Were you not the regional financial officer?

THE WITNESS: No, I wasn't.

Q. (By Mr. Marcus) Mr. Primack made a mistake when he said that?

A. Well, I can explain that to you. You see, we don't have a regional financial office. What I did at the time he made that statement, if anybody brought in a check they would give it to me, and I would mail it to New York, and my responsibility, I was the person who sent things to New York.

THE COURT: Do you have a table of organization?

Do you have a big chart at your headquarters, the U. S. Labor Party headquarters or wherever --

THE WITNESS: No.

THE COURT: (Continuing) -- that shows the table of organization?

THE WITNESS: No. We have a constitution that actually has that in it.

THE COURT: You do?

THE WITNESS: Yes.

THE COURT: Did you bring that?

THE WITNESS: I didn't bring it, no.

Q (By Mr. Marcus) Who has taken over your job of forwarding checks to New York?

A I still mail them.

Q You still do?

A Yes.

Q Do you keep records of those checks that you mail to New York?

A Yes. And I can tell you, I haven't sent any to the Labor Party in three years.

Q Why not?

A. I haven't gotten any.

Q. You are really doing awful raising money, hunh?

A. The Labor Party is not --

Q. Your campaign did quite well?

A. Yes.

Q. You raised over $10,000, didn't you?

A. Yes. I ran as an independent candidate on --

Q. Originally you ran under the banner of the U. S. Labor Party, isn't that so?

A. I was an independent.

Q. Do you know a Steven Warm?

A. Yes.

Q. He was your campaign treasurer?

A. That's right.

Q. And both of you signed up to be a candidate for what, the U. S. House of Representatives?

A. That's right.

Q. And you signed up as a candidate of the U. S. Labor Party; is that correct?

A. Well, when we first filed our papers there was, you had to file from your campaign committee, which we did.

We formed a committee. They asked if I was affiliated with any party, and at the time I thought -- was I a member of any party, and I said yes, the U. S. Labor Party. Subsequently I learned upon conferring with the Federal Election Commission that that didn't mean that the U. S. Labor Party was affiliated, and if you check the records of the F.E.C., you will see that there is a letter dated a week or so later which states that I have no connection with the U. S. Labor Party as a candidate.

Q As a matter of fact, you have your dates messed up, don't you?

A Well, I don't really remember the dates.

Q Isn't it true that you filed with the F.E.C. November 15, 1977?

A I don't remember. That sounds --

Q Is that about right?

A Yes.

Q And you wrote to the F.E.C. on March 30, '78, to tell them of the --

A Did I do that, or did Steve?

Q Steve did it, right.

A. Steve had responsibility for the whole -- I signed away any control over the campaign finances.

Q. And that is about when he did it, March 30, '78?

A. I think so.

Q. And he was the officially designated treasurer, is that correct?

A. Of my campaign.

Q. But you actually kept the books, didn't you?

A. No.

Q. You filled out the forms, didn't you?

A. Of what? The various forms --

MR. MITCHELL: I object to this whole line of questioning. We are going into the matter of her candidacy for office.

THE COURT: Overruled.

Q. (By Mr. Marcus) And The Committee to Elect Debra Hanania-Freeman was also located at 2539 St. Paul Street, right?

A. Right.

Q. And shared the same telephone with the U. S. Labor Party?

A. Right.

Q. And with New Solidarity International Press Service, Inc.?

A. Yes.

Q. And also with Campagner Publications, Inc.?

A. Yes.

Q. And were there any other committees operating out of that office?

A. I don't think so.

Q. Just those four?

A. Well, they didn't operate out of the office per se. I'm not sure exactly what you mean by operate.

Q. Well, they used that office as their address?

A. Oh, yes.

Q. Were there any other organizations using that office as their address?

A. I don't think so.

Q. But you kept the books, didn't you, for your own campaign?

A. No. I kept them, Steve was involved, Belinda DeGrazia was involved.

THE COURT: Who filed the returns --

THE WITNESS: F.E.C.?

THE COURT: No, the State of Maryland, to the Secretary of State.

THE WITNESS: The Secretary of State simply has to receive a copy of the F.E.C. forms and they are due like, I believe quarterly. Every time we had to prepare one of those things, we would all get together, myself, Steve, sometimes Nancy Radcliffe, sometimes Belinda DeGrazia, to kind of figure out exactly what had been done. But I didn't have signature on the checks of that account.

THE COURT: But you filed some sort of a report within a specific period of the campaign, that you had spent so much money to date, that you had raised so much money to date, and then there came a time that you had to file another report right before the election.

THE WITNESS: That's right.

THE COURT: And what your balance was, or if you owed, and then after the election was over, a certain period of time elapsed and you were required by law to file your final report.

THE WITNESS: (Nodding head affirmatively.) I wasn't responsible for filing anything. Steve Warm was responsible. I filed an affidavit.

THE COURT: Yes, the treasurer --

THE WITNESS: Of my campaign, yes.

THE COURT: (Continuing) -- or the political agent.

THE WITNESS: He was treasurer of my campaign.

THE COURT: What was your husband?

THE WITNESS: He was nothing in my campaign.

THE COURT: Did Steven Warm ever file those?

THE WITNESS: Of course he filed those.

THE COURT: Are they now on record?

THE WITNESS: Absolutely.

MR. MARCUS: Let me clarify perhaps a little bit, Your Honor.

Mark this as No. 4 for Identification.

(The document was marked Plaintiff's Exhibit No. 4 for Identification.)

MR. MITCHELL: May I see those, please?

MR. MARCUS: Sure (handing).

THE COURT: What are they, by the way?

MR. MARCUS: The F.E.C. files.

THE COURT: Are they records kept in the ordinary course of business?

MR. MARCUS: Yes. But these are copies, of course.

I would like to have these received in evidence.

THE COURT: All right, they are admitted.

Q (By Mr. Marcus) I notice here that the money was kept in the Maryland National Bank; is that correct?

A Right.

Q Under what name?

A The Committee to Elect Debra Hanania-Freeman.

Q Who had the power to sign those --

A Steve Warm, Nancy Radcliffe and Belinda DeGrazia.

Q They are all members of the U. S. Labor Party, aren't they?

A Yes.

Q Where does Mr. Warm live?

A He lives with Belinda DeGrazia in Roland Park.

Q But you don't know where?

A I can give you roughly where. I don't know the exact address.

Q No, that's all right.

I am showing you various pages of this Plaintiff's Exhibit 4. This is your handwriting, is it not?

A I'm not sure whether it is mine, or Steve's.

Q Well, is this your signature (indicating)?

A Yes, that is my signature.

Q This is the statement of the candidate for nomination for election to federal office, right?

A Right.

Q You don't know whether this printing is yours?

A I think it is.

Q It looks like yours, doesn't it?

A It looks like mine.

Q I am showing you another page from Plaintiff's Exhibit 4, which is a report of receipts or expenditures from April 1, '78, through June 30, '78. And this is actually your handwriting, isn't it?

A Let me just --

Q Just answer the question.

A Yes, it is my handwriting. I copied this from a report that was prepared by Steve.

Q But you didn't file his report, you filed the one you wrote?

A He didn't write a form. You see, his time was limited. He worked full-time --

Q Where?

A Johns Hopkins.

Q What department at Johns Hopkins?

A I don't know. It's at the hospital. He used to work at the University.

Q But he was actually the treasurer, then, of your campaign?

A Yes.

Q But you kind of helped him keep the books?

A No, he kept the books.

Q What means did you use to raise money for your campaign?

A Well --

MR. MITCHELL: Objection. The campaign was an

independent creature, and not related to or associated with the U. S. Labor Party.

THE COURT: We want to find out -- the question I think tends to find out whether or not it was. Overruled.

A. I held three fund raisers, and we got some money from those. And then, of course, what happened was, you know, in the course of a campaign you speak at various meetings, and all the meetings that I spoke at, I made it very clear that my campaign needed money. And I made some phone calls to people.

Q. (By Mr. Marcus) To whom?

A. Who did I call for money?

Q. Yes.

A. Everybody I knew.

Q. Who is that? Who gave --

THE COURT: Objection sustained.

MR. MITCHELL: Thank you.

Q. (By Mr. Marcus) According to my calculations here, you raised $1,850 or more of unitemized contributions.

A. Right.

Q. How did you do that?

A. Well, we printed a bumper sticker, and we took contributions for the bumper stickers, and that item was a significant amount of the money that we raised. We also --

Q. To whom did you sell those stickers?

A. We sold them on walking tours, and then various people who supported my campaign took bunches of them, and they -- you know, you can't sell a bumper sticker for very much, maybe seventy-five cents or a dollar.

Q. These people that went around selling them, can you name them?

A. I can name some of them.

MR. MITCHELL: Objection.

THE COURT: Sustained.

A. (Continuing) Let's see, there was --

THE COURT: You don't have to answer.

Q. (By Mr. Marcus) These people who went around selling bumper stickers for you, how many of those were members of the U. S. Labor Party?

A. In rough percentage, probably about forty-five, fifty percent.

Q. Did you do anything else besides selling bumper

stickers?

A. Very often I would hold campaign meetings, and they would put out leaflets saying I was giving a talk about the problem of jobs in Baltimore City or something.

THE COURT: Did you ever receive any contributions from the U. S. Labor Party, either regional, national, international or whatever?

THE WITNESS: No.

THE COURT: Universal?

THE WITNESS: No.

Q. (By Mr. Marcus) Isn't it the case that you had ads on Channel 11?

A. Yes.

Q. They were paid for in cash, weren't they?

A. No.

Q. No?

A. No. They were paid for by check.

Q. Always by check. I guess I have my information wrong.

THE WITNESS: You are talking about my personal ads, right?

MR. MARCUS: Your campaign ads.

THE WITNESS: Yes, they were always by check.

Q (By Mr. Marcus) But there was a great deal of activity of purchasing reproduction services, copying services, which was paid for in cash, is that not correct, by the U. S. Labor Party?

MR. MITCHELL: Objection. Could we ask if these things were paid for by the U. S. Labor Party, or otherwise?

THE COURT: Or these other organizations.

MR. MARCUS: If you had listened to my question, I said by the U. S. Labor Party.

THE WITNESS: I don't know.

Q (By Mr. Marcus) Because you never go and get things reproduced?

A Not for the U. S. Labor Party.

Q For your campaign?

A Absolutely.

Q Was that ever paid for in cash?

A No, I don't think so.

Q Who is running Mr. LaRouche's campaign in Baltimore?

A. Well, he doesn't have a committee in Baltimore. He's got a national committee set up, which I believe Elise Gelman is the treasurer.

Q. Is she in New York?

A. Yes.

Q. Do you know her address?

A. I'm sorry, I don't know.

Q. I might want to send a contribution, actually, if you do know.

A. I can give you the address, but it's a P. O. Box, I think 1943. But I'm not positive.

Q. But if I gave you a check, you would send it up there?

A. I would find a place to send it.

Q. How would you do that?

A. Actually, I would go back to my office and look at the top of the Citizens For LaRouche stationery.

THE COURT: How much longer do you think you will be with this witness?

MR. MARCUS: I don't know. As short as possible.

Q. (By Mr. Marcus) Now, how about the Fusion Energy

Foundation, is that familiar to you?

A. Yes.

Q. Are you a member of it?

A. No.

Q. Do you know anybody around here who is a member?

A. Bob Primack I believe.

Q. There is also something called The Committee For Free Elections, right?

A. If it exists. I don't know if it still exists. It was during the 1976 Presidential.

THE COURT: Are you a member of it?

THE WITNESS: No, I am not.

THE COURT: Anybody from the U. S. Labor Party a member that you know of?

THE WITNESS: Not that I know of.

THE COURT: Is your husband a member of it?

THE WITNESS: No, he is not.

Q. (By Mr. Marcus) What is the annual dues to become a member of the U. S. Labor Party?

A. I don't know. I never paid any.

THE COURT: Were you given abstinence from paying

dues?

THE WITNESS: I don't think there are any. I have never been informed of any dues.

Q (By Mr. Marcus) If I said to you right now that I subscribed, hypothetically, to the tenets or political positions of the U. S. Labor Party, would that automatically make me a member?

A Well, it might, if I thought you were telling the truth.

THE COURT: You mean you wouldn't accept him if you thought he was telling the truth?

THE WITNESS: Oh, if I thought he was telling the truth, I would absolutely accept him.

Q (By Mr. Marcus) You have the power, then --

THE COURT: Why don't you join? Then you might find out where they keep the money.

MR. MARCUS: Excellent idea.

Q (By Mr. Marcus) Would I, if I joined?

A Let me just explain something to you. There is, as I said before -- you asked me if we keep membership lists. Membership in the U. S. Labor Party is not a hard and fast

formal thing. If you were a member, for instance, you wouldn't really have any privileges that you don't have now. If you wanted to come to our meeting on Sunday, you would be perfectly welcome, and you could come whether you agreed with our ideas or not. They are open public meetings. And that's about all I can tell you. If you said, I agree with your ideas. Can I become a member of the U. S. Labor Party? Then I might, Lyndon LaRouche might --

Q He is the one who finally decides?

A Who the members are?

Q Yes.

A I don't think anybody --

THE COURT: It appears that the U. S. Labor Party is something, in all probability, that in order to give some clout, is probably a vehicle to get some sort of articles in the paper, and the U. S. Labor Party would appear to have some link to all these organizations, Baltimore City organizations, the Baltimore Metropolitan Independent Democratic Association or whatever, which probably has three members, but as a result of their getting something into the papers endorsing someone, they might get a few thousand

bucks contribution from the candidate, because the candidate thinks they can collar a certain amount of votes.

Now, I am not saying this is the situation of the U. S. Labor Party, that some presidential or some congressional candidate might not give them a lot of money for support.

Q (By Mr. Marcus) Isn't it the case that the U. S. Labor Party spent over a hundred thousand dollars running ads for LaRouche in '76?

A I don't think they spent any money for him. There was a Committee to Elect LaRouche, however, because I made a contribution, and I think they paid for his ads.

Q In cash, isn't that right?

A I don't know. I wasn't there, I was in Baltimore.

Q But that is possible, isn't it, that some was paid in cash?

MR. MARCUS: Well, strike that question.

MR. MITCHELL: Objection -- well, all right.

Q (By Mr. Marcus) Has the subject of this $30,000 judgment against the Labor Party in behalf of Mr. Whitman ever come up at the local meetings?

A. No.

Q. Never discussed it?

A. Well, when it happened, we announced it.

Q. Unhappily, of course.

A. Absolutely.

THE COURT: Was Mr. Whitman a member of the U. S. Labor Party?

THE WITNESS: Certainly not.

THE COURT: Was he ever a member of any of the other organizations that have been mentioned here today?

THE WITNESS: I hope not.

MR. MARCUS: I think we can stipulate that he was not.

THE COURT: I am asking for my own information.

Was Parren Mitchell a member of the U. S. Labor Party?

THE WITNESS: No.

Q. (By Mr. Marcus) This subject of the judgment has never come up at a local meeting?

A. As I said, we announced it when it happened.

Q. How about when the Supreme Court denied certiorari,

did you discuss that?

A. We just announced that.

Q. So you discussed it.

A. There was never really a discussion, but we made an announcement, you know. We tried to keep them informed of progress.

Q. Did you announce the intention of finally paying?

A. No.

Q. It's the end of the road, right? No other courts.

A. It's the end of the road, yes.

Q. You didn't discuss paying it?

A. No.

Q. Why hasn't it been paid?

A. I don't know. I don't have responsibility for that.

Q. But the subject of paying it has never come up?

A. Not at a local meeting.

Q. Let me ask you this. If the U. S. Labor Party and its members and committeemen, in order to maintain the integrity of the U. S. Labor Party, et cetera, got together, they probably could satisfy the judgment, couldn't they, if

they were disposed to do so?

A. I don't know. We are pretty poor. I don't know.

Q. You are not paying the rent on your office, right? You got the New Solidarity paying that.

A. New York pays.

Q. Right. New Solidarity International Press Service pays the rent on the office, is that correct, that your members work out of?

A. I guess.

THE COURT: Is that entity a member of the U. S. Labor Party?

MR. MARCUS: It certainly smells like that, doesn't it?

THE WITNESS: It's a private corporation.

THE COURT: But there are members --

THE WITNESS: There are members and non-members, I suppose.

Q. (By Mr. Marcus) Does the U. S. Labor Party currently have any bank accounts, to your knowledge?

A. I can only answer for Maryland, and to my knowledge, not in Maryland.

MR. MARCUS: Cross-examine?

MR. MITCHELL: No questions.

THE COURT: All right, you are excused.

(Witness excused.)

THE COURT: We will take a minute or so recess.

(Thereupon, a short recess was taken.)

MR. MARCUS: Call Mr. Primack.

Thereupon --

ROBERT PRIMACK

a Witness, produced for oral examination on call of the Plaintiff, having been first duly sworn by the Notary Public, was examined and testified as follows:

THE COURT: State your name and address.

THE WITNESS: Robert Primack, 3215 North Charles Street.

THE COURT: Keep your voice up so I can hear.

DIRECT EXAMINATION

BY MR. MARCUS:

Q You are an executive officer of the U. S. Labor

Party in Maryland?

A. I am an executive.

THE COURT: Are you an executive officer?

THE WITNESS: I am a member of the executive.

THE COURT: What's that?

THE WITNESS: That's a body of three people.

Q. (By Mr. Marcus) Where does that body of three people meet?

A. Humh?

Q. Where does the body of three people meet?

A. No place special.

Q. Who are the other two members of this body?

A. Myself, and Debra Freeman and Lawrence Freeman.

Q. What does this body do?

A. We discuss the Labor Party.

Q. What about the Labor Party do you discuss?

A. We discuss people that are members of the Labor Party, what they are thinking about, their ideas.

THE COURT: Let me ask one question. What is the extent of your education, by the way?

THE WITNESS: I'm a college graduate.

THE COURT: What college?

THE WITNESS: Haverford College.

Q (By Mr. Marcus) Do you have a degree?

A A regular B.A. Degree.

THE COURT: Any postgraduate training or education?

THE WITNESS: No.

Q (By Mr. Marcus) What was your specialization in college?

A Mine?

Q Yes.

A Philosophy.

Q Now let me ask you this straightforwardly. Who handles the money for the U. S. Labor Party in Maryland?

A At this point, no one really does.

Q Why not?

A The Labor Party does not have any money.

Q What happened to all its money?

A (Continuing) We don't have any money at this point.

Really, I have no idea.

THE COURT: What happened to all the money?

THE WITNESS: I don't know what money you are talking about.

THE COURT: You say they don't have any money now. What happened to the money they had?

THE WITNESS: As I previously testified, when I received a check for the U. S. Labor Party -- and I don't actually remember any particular one -- I would give it to Debra Freeman.

Q (By Mr. Marcus) She was then the regional financial officer?

A I would give her the checks.

Q Is that what you meant in court when you testified that she was the regional financial officer?

A I meant that I gave her the checks.

Q You didn't say that in court.

A That is what I meant.

Q Is she still the regional financial officer?

A If I was to get a check for the U. S. Labor Party, I would give it to her.

THE COURT: Why to her rather than some other member of the U. S. Labor Party?

THE WITNESS: That is the way we always did. She mails it up to New York, she handles it.

THE COURT: Is she considered the top banana here in Maryland of the U. S. Labor Party?

THE WITNESS: No.

THE COURT: Why not give it to Lawrence?

THE WITNESS: Because I have always done that since I came here four years ago.

THE COURT: Why not give it to Steve Warm?

THE WITNESS: I have always given it to Debbie.

THE COURT: Were you instructed to?

THE WITNESS: When I came here four years ago, yes.

Q (By Mr. Marcus) Who instructed you to do that?

A. I don't remember.

Q LaRouche?

A. I don't remember.

THE COURT: From where did you come?

THE WITNESS: I came from New York.

Q (By Mr. Marcus) You were sent down here by the Party, weren't you?

A. I was sent down here to work, yes.

THE COURT: By the Party?

THE WITNESS: No, not by the Party.

Q (By Mr. Marcus) By the National Caucus of Labor Committees?

A No.

THE COURT: Who sent you here?

THE WITNESS: I was told by a woman in New York to come down.

THE COURT: What is her name?

THE WITNESS: Carol White.

THE COURT: What is her address?

THE WITNESS: I don't know.

THE COURT: What was her capacity, or what was her job? What was her profession?

THE WITNESS: She worked in New York.

THE COURT: Doing what?

THE WITNESS: I don't know what kind of employment she had. She was a member of the Labor Party.

Q (By Mr. Marcus) How much salary do you get from the Party?

MR. MITCHELL: Objection.

THE COURT: Overruled.

A. I don't get any.

Q. (By Mr. Marcus) How much do you get from the National Caucus of --

A. None.

Q. Where do you work?

A. I am unemployed.

Q. Does your wife work?

A. Yes.

Q. Where does she work?

A. In New York.

Q. Who does she work for?

A. She works for herself.

THE COURT: What does she do? Tell us what she does.

THE WITNESS: I don't know exactly what she does. Some type of typesetting work in New York City.

THE COURT: When is the last time you saw your wife?

THE WITNESS: Over the weekend.

Q. (By Mr. Marcus) Does she give you money?

A. Presently, no.
Q. How do you live?
A. How do I live?
Q. Yes.
A. I have savings, I have some money.
Q. You are living off of savings?
A. Yes.
Q. Do you ever get money from the U. S. Labor Party?
A. No. I already said that.
Q. Or from the National Caucus of Labor Committees?
A. No.
Q. Or from New Solidarity International Press Service?
A. No.
Q. Do you ever sell New Solidarity newspapers?
A. Have I ever sold the newspaper?
Q. Yes.
A. (No response.)
Q. Yes or no?
A. I am thinking. Certainly not recently. Maybe four or five years ago.
THE COURT: Let's go back -- I don't understand

something -- so we can get a trend in the case.

What kind of work did you do in New York before you came down here to Baltimore, before you were sent down here by some woman -- was her name Alice?

THE WITNESS: Carol White.

THE COURT: Carol White?

THE WITNESS: Yes. Personally, I have been married for a number of years.

THE COURT: What kind of work did you do?

THE WITNESS: I do not work.

THE COURT: Do you come from a wealthy family?

THE WITNESS: Fairly wealthy.

THE COURT: Are you the beneficiary under any trust estate where you are getting so much money a month or a week?

THE WITNESS: Not presently, no, but my wife has been employed for a number of years.

THE COURT: But you don't know where she is employed. You just said that.

THE WITNESS: She is presently not sending me any money.

Is that an issue?

THE COURT: No, no, no, that is not an issue, but it has something to do with how your responses to questions should be taken.

Why don't we clear the thing up? I want to know who sent you here, why you were sent, if you got any money for being sent here, and who paid you.

THE WITNESS: I didn't get any money for being sent here.

THE COURT: Why did you come?

THE WITNESS: Because I wanted to come to Baltimore.

MR. MARCUS: You like the Orioles?

THE WITNESS: No.

THE COURT: For what reason did you want to come to Baltimore?

THE WITNESS: I was interested in organizing people and discussing the Labor Party.

THE COURT: You then were a member of the Labor Party in New York?

THE WITNESS: Yes.

THE COURT: And that was your mission here, to help work in the Labor Party in Maryland?

THE WITNESS: That's right, a volunteer.

THE COURT: Now, someone is at the head of the Labor Party.

THE WITNESS: That's correct.

THE COURT: And then underneath that head are certain other people in a supervisory or executive capacity.

THE WITNESS: That's correct.

THE COURT: Okay. Now, who was your immediate executive and/or supervisor and/or leader or whatever?

THE WITNESS: Well, here in Baltimore?

THE COURT: No, in New York.

THE WITNESS: In New York, Carol White is a member of the National Executive Committee.

THE COURT: Okay.

Q (By Mr. Marcus) Are you a member of this National Executive Committee?

A No, I am not.

Q Who put you on the local Executive Committee, or whatever it's called?

A. It was really done in a very informal kind of way.

Q. In other words, you are self-styled? You know what that expression means, don't you?

A. Yes.

Q. The three of you appointed yourselves?

A. Right. Essentially we function, you know, on the basis that we agreed we would call ourselves the executives, yes.

Q. Are there other members of the Party --

A. Other members?

Q. (Continuing) -- in Baltimore besides the three of you?

A. Yes, sure.

Q. But you appointed yourselves, you and --

A. I don't really remember. This is four years ago.

Q. Has there been any election since then?

A. No election since then.

Q. And no money collected in, what, the last three or four years?

A. I haven't collected any money.

THE COURT: How old are you, by the way?

THE WITNESS: Myself, I am thirty-four.

Q (By Mr. Marcus) And the Party right now is not paying rent for its office in the Medical Arts Building, right?

A I know nothing about that.

Q You never go down to that office?

A Yes, I do.

Q You didn't negotiate the lease, though, did you?

A No.

Q Who did?

A I believe that Larry did. I didn't.

MR. MARCUS: Okay, we will talk to him about that.

Q (By Mr. Marcus) Is Lyndon LaRouche running for President this year?

A Yes, he is.

Q Actually, next year.

A (Continuing) Well, he is running for President this year, and next year he is running.

Q Under the U. S. Labor Party?

A Well, he hasn't been officially endorsed, but he is a member and --

Q You are running for what, the City Council?

A That's right.

Q Under the U. S. Labor Party?

A That's right.

Q Have you raised any money for your campaign?

A No.

MR. MITCHELL: Objection.

THE COURT: Overruled.

A (Continuing) No.

Q (By Mr. Marcus) Plan to?

A I really haven't thought about it.

Q Where did you get the $50.00 or whatever sum --

A It was my money.

Q (Continuing) -- to file?

A My money.

Q And you have no plans whatsoever to raise money to --

A I said -- that is not what I meant. I said I'm not sure.

Q You are not sure?

A I said I have not thought it out. However --

THE COURT: What Council seat are you running for?

THE WITNESS: Second District.

Q (By Mr. Marcus) So you haven't yet finalized your plans with respect to raising money?

A No.

Q Have you finalized any campaign plans?

A No.

Q When is the election, by the way, the 10th of September or --

A The Primary is the 10th of September, yes.

Q And you haven't got your plans worked out yet?

A No.

Q Are you meeting with anybody else to make those plans?

A No.

Q Why did you run for the office?

A I wanted to run for office --

MR. MITCHELL: Objection. That is really not relevant to the issue before the Court.

THE COURT: Sustained.

Q (By Mr. Marcus) Have you got a bank account set up

for your campaign?

A. Yes, I do.

Q. What bank?

A. I believe it's Maryland National. And I have a treasurer.

Q. Who is your treasurer?

A. Thomas Szymecko.

Q. Can you spell that?

A. S-z-y-m-e-c-k-o.

Q. Where does he live?

A. He lives at 3205 Abell Avenue.

Q. He is your treasurer, but he doesn't have any money, right?

A. I didn't say that.

Q. Has any money been raised for your campaign?

A. I said no.

Q. How did you start the bank account at Maryland National without any money?

A. My money.

Q. Your money personally?

A. Yes.

Q What is the name of the committee?

A I believe it's the Committee to Elect Primack, but I'm not sure. I take that back. I think it's Primack for City Council. That's what it is.

Q You don't know the account number, do you?

A No, I do not.

Q Can you sign checks?

A Excuse me?

Q Are you allowed to sign checks on that account?

A Yes, I am.

Q How much did you put into that initially?

MR. MITCHELL: Objection again. It has no relevancy, if he says the funds did not come from the U. S. Labor Party or any of these organizations.

Q (By Mr. Marcus) Where did the money come from?

A I already said it was my money.

Q All you have is your money?

THE COURT: You say it's your money, but where did you get it? Where did you get the money to put up?

THE WITNESS: I have some savings.

THE COURT: You got those savings from where?

THE WITNESS: My wife and I separated recently. I don't see that that is an issue.

THE COURT: Well, I will decide what is an issue and what is not an issue.

THE WITNESS: She went to New York about a month and a half ago.

THE COURT: She came to Baltimore with you, then?

THE WITNESS: Yes, that's right.

THE COURT: Then you separated?

THE WITNESS: About a month and a half ago.

THE COURT: And she went back to New York?

THE WITNESS: That's right.

THE COURT: So you had a property settlement?

THE WITNESS: Well, we worked things out informally. Yes, that's right.

THE COURT: She gave you so much money, and she took so much money?

THE WITNESS: That's correct.

THE COURT: Okay.

Q (By Mr. Marcus) And all the money that was put into that bank account for the Primack Committee came out of

that savings?

A It was my mine, that's right.

Q Have you asked the U. S. Labor Party to give you any money for your campaign?

A No.

Q Do you expect it to?

A No.

Q When you put down that you are a candidate under the banner of the U. S. Labor Party for City Council, what exactly did that mean?

A That means I am a member of the U. S. Labor Party, and I am running as a member of the U. S. Labor Party.

Q Are you going to get support, are you an official candidate of the Party?

A No.

THE COURT: Let me ask a question here. As a member of the U. S. Labor Party, can you be both, either a Democratic or --

THE WITNESS: No, I am registered Labor Party.

THE COURT: You are registered as Labor Party?

THE WITNESS: That is correct. If you want to --

FEDERAL ELECTION COMMISSION

Bank acct. numbers

Bank records not used in the M.U.R

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
___	(5) Internal Documents		

Signed J G Levine

date 11-23-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Memos to file, bank acct numbers, memo from audit to OGC, routing slips

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	✓	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed ___

date ___

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Bank account numbers routing slips,

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed ___

date ___

FEC 9-21-77

FEDERAL ELECTION COMMISSION

~~Exhibit~~ bank account

Numbers

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
___	(5) Internal Documents		

Signed J. J. Lenz

date 11-30-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

bank account numbers routing slip

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

signed [signature]

date 11-30-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

bank account numbers routing slip

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy.
___	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

signed JG Lewis

date 11-30-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Conciliation material bank account routing slips receipt acknowledgements memo file

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
✓	(3) Exempted by other statute	✓	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed ___

date ___

FEC 9-21-77

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 29, 1980

MEMORANDUM

TO: Federal Bureau Of Investigation Laboratory
Attention: Documents Section

FROM: Federal Election Commission
Charles N. Steele, General Counsel

SUBJECT: MUR 1158 - In re Debra Hanania Freeman, aka
Dr. Debra J. Hanania, aka Debra Hanania

Statutory violations alleged: 2 U.S.C. § 441f (making a political contribution in the name of another; 26 U.S.C. § 9042 (c)(1)(A) (knowingly and willfully furnishing false information or evidence to the Commission in connection with Presidential primary matching funds request).

Statement of the Facts: The first aspect of the request involves contributions reported by Citizens for LaRouche as having been made by the following individuals: David Sanders, Nancy Radcliff, and Kevin Salisbury. Documentation filed with the Commission as required to evidence these contributions reveals physical dissimilarities among various signatures attributed to each of these three individuals.

The second aspect of the request involves various contributions reported by Citizens for LaRouche as having been made by the three individuals listed above as well as the following individuals: Dr. Debra J. Hanania, Debra J. Hanania, Anne R. Taylor, Charles Clark, and Ernest K. Pulsifor. Some of the documentation filed with the Commission to evidence these contributions reveals physical similarities in the writing of the words "Citizens for LaRouche".

Evidence Attached:

1. Document filed with the Commission purporting to be a copy of the back of a check #175 drawn by HFC on Continental Bank made payable to David Sanders; the back of the check bears an endorsement of the check reading "Pay to the order of Citizens for LaRouche David C. Sanders" and bears a stamped notation reading "Citizens For LaRouche Citibank [illegible]".

2. Document filed with the Commission, dated January 22, 1980, and purportedly containing the signature of David C. Sanders.

3. Document filed with the Commission, dated December 28, 1979, and purportedly containing the signature of David Sanders.

4. Document filed with the Commission purporting to be a copy of American Express Money Order #55-467,316,467, dated 1/3/79, and purportedly containing the signature of David Sanders at the bottom under the notation "Sanders' Name and Address".

5. Document filed with the Commission purporting to include a copy of Travelers Express Money Order #189 2926722, dated Sept. 12, 1979, and purportedly containing the signature of Nancy Radcliff.

6. Document filed with the Commission including 6A and 6B:

6A. Document purporting to be a copy of a personal check numbered 234 drawn on account number [redacted] at The Equitable Trust Company, dated December 3, 1979, and purportedly containing the signature of Nancy Radcliffe.

6B. Document purporting to be a copy of a personal check numbered 235 drawn on the same account as Document 6A and purportedly containing the signature of Nancy B. Radcliffe.

7. Document filed with the Commission purporting to be a copy of Travelers Express Money Order #189 2957627, dated January 12, 1980, and purportedly containing the signature of Kevin Salisbury.

8. Document filed with the Commission containing at the bottom a statement, dated January 21, 1980, and purportedly containing the signature of Kevin C. Salisbury.

9. Document filed with the Commission including 9A, 9B, and 9C:

9A. [Not relevant for present purposes].

9B. Document purporting to be a copy of a personal check numbered 1077 drawn on account number [redacted] at the Maryland National Bank, dated 6 August 1979 and listing the payee as "Citizens for LaRouche".

9C. Document purporting to be a copy of a personal check numbered 999 drawn on account number [redacted] at the Maryland National Bank, dated 4 Nov. 1979, and listing the payee as "Citizens for LaRouche".

10. Document filed with the Commission purporting to be a copy of a personal check numbered 1160 drawn on account number [redacted] at the Maryland National Bank, dated Nov. 24, 1979 [partially obliterated], and listing the payee as "Citizens for LaRouche".

11. Document filed with the Commission purporting to include a copy of a personal check numbered 1166 drawn on the same account as Document 10, and listing the payee as "Citizens for LaRouche".

12. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,411, dated 11/20/79, and listing the payee as "Citizens for LaRouche".

13. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,402, dated Nov. 13, 1979, and listing the payee as "Citizens for LaRouche".

14. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,424, dated 12/4/79, and listing the payee as "Citizens for LaRouche".

Requests:

1. In the opinion of the Bureau, were the signatures of David C. Sanders on Documents 1 and 2 and the signatures of David Sanders on Document 3 and on the bottom of Document 4 all made by the same individual and, if not, how many different individuals are responsible for the four signatures?

2. In the opinion of the Bureau, were the signatures of Nancy Radcliff, Nancy Radcliffe, and Nancy B. Radcliffe, on Documents 5, 6A, and 6B, respectively, made by the same individual and, if not, how many different individuals are responsible for the three signatures?

3. In the opinion of the Bureau, were the signatures of Kevin Salisbury and Kevin C. Salisbury, on Documents 7 and 8, respectively, made by the same individual?

4. In the opinion of the Bureau, were the notations "Citizens for LaRouche" on Documents 4, 5, 7, 9B, 9C, 10, 11, 12, 13, and 14, all made by the same individual and, if not, were any of them made by the same individual as any others and, if so, which ones?

Pursuant to discussions between James Lile of your section and Hal Ponder and Kevin Smith of this office, we are requesting that this matter be handled on an expedited basis. We recognize that in relying on photostats rather than originals you may not be able to make a definite conclusion. However, the opinions requested need not be absolutely definitive, since the matter will be pursued by taking signature sample, in the manner you described to Hal Ponder and by obtaining the originals of the documents enclosed if your preliminary analysis indicates that such investigation might be fruitful.

Should you have any questions, please call Kevin H. Smith (523-4529), the attorney assigned to this matter.

Thank you.

CCH 558

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, Maryland 21210

February 26, 1980

General Counsel
Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

Dear Sir:

This will acknowledge receipt of your letter of February 19, 1980. In view of the fact that I have, to the best of my knowledge, neither submitted directly nor caused anything to be submitted to your Commission within the past seven months (since I terminated my principal campaign committee, the Committee to Elect Debra Hanania Freeman), I am at a lose to comprehend you internally generated memorandum.

Nevertheless, I shall be happy to cooperate with any investigation. Because of the paucity of any factual background in your letter of February 19, 1980 to which I can respond, I suggest a personal meeting. Such meeting should be in the office of my attorney, Robert C. Prem, 929 North Howard Street, Baltimore, Maryland 21201.

I hereby authorize you to communicate directly with Mr. Prem as to the date and time of the meeting and to mail to him all notification and other communications. Mr. Prem's telephone number is 301-539-3240.

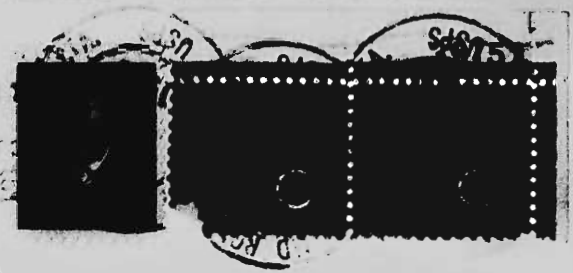
Sincerely,

Debra Hanania Freeman

Debra Hanania Freeman

cc: Robert C. Prem

Debra Hanania Freeman
4004 Linkwood Rd.
Baltimore, Maryland 21210



Office of the General Counsel
Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

RETURN RECEIPT REQUESTED

CERTIFIED
No. 115358
MAIL

* certified mail return receipt requested

RECEIVED
GENERAL COUNSEL

February 25, 1980

80 FEB 27 P2:29

Kenneth Gross, Esq.
Assistant General Counsel for
Public Financing
Federal Election Commission
Washington, D.C. 20463

086525

Dear Mr. Gross,

This is for your information regarding Lyndon LaRouche, the Citizens for LaRouche, the U.S. Labor Party, et al, and my efforts to collect a $30,000 libel judgment. We are alleging - in part - that the Party is co-mingling funds, including funds from the F.E.C. illegally.

Yours truly

Granville B. Whitman

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN	*	
Plaintiff	*	
v.	*	1975/387/18960
U.S. LABOR PARTY	*	
Defendant	*	

* *

REQUEST TO ADMIT FACTS

Now comes the Plaintiff, Grenville B. Whitman, by his attorney, John C. Armor, and asks that the Defendant, U.S. Labor Party, admit the following facts and documents, pursuant to Md. Rule 421:

1. That the facts set forth in the attached Memorandum of Facts are true, paragraph by paragraph and sentence by sentence.

2. That the documents attached as Exhibits to the Memorandum of Facts, and the one Exhibit to the Motion to Seal the Record, are genuine, page by page.

Respectfully submitted,

John C. Armor
Attorney for Plaintiff

Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

Of Counsel:

Philip L. Marcus, Esq.

2617 Guilford Avenue
Baltimore, Maryland 21218
(301) 889-3890

CA:mks
/15/80

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENV LLE B. WHITMAN *

Plaintiff *

v. * 1975/387/18960

U.S. LABOR PARTY *

Defendant *

* *

ORDER

For good cause shown it is ORDERED this 19th day of Feb., 1980, that the Motion to Seal the Record, this Order, and the Motion for Receivership and all Exhibits attached to it, in the above case, shall be sealed immediately, and shall remain sealed until Plaintiff certifies to the Court that these papers have been served on Lawrence Freeman and the Department of Assessments and Taxation, at which time the Clerk shall immediately unseal all of these papers.

A. Sklar
Judge

TRUE COPY TEST
SAUNDRA E. BANKS
CLERK

Law Offices of
John C. Armor, P.A.
Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN	*	
Plaintiff	*	
v.	*	1975/387/18960
U.S. LABOR PARTY	*	
Defendant	*	

* *

MEMORANDUM OF AUTHORITIES

The special relief prayed is permitted by Md. R. 628d., which provides:

> Under sections a., b., and c. of this Rule the Court shall grant relief unto said judgment creditor by an order in the nature of injunction, decree for specific performance, writ of mandamus, or for the appointment of a receiver, and shall pass such order as will subject the property or credits of judgment debtor, either in his own hands or in the hands of any person to the operation of the judgment, or other person giving him proper opportunity to be heard by the court passing such as order to decree. (Emphasis added)

The Court of Appeals held, in Dundalk Holding Co. v. Easter, 215 Md. 549, 137 A.2d. 667 (1958), that this Court, although a Court of Law, is bound to grant equitable relief such as is prayed as if it were a Court of Equity. Specifically, although not a limitation of authority, a receiver may be appointed, Wolcott v. Quick, 253 A.2d 521 (1969).

In a supplemental proceeding, such as is in progress in this action, "*** if the title to the property alleged or claimed to be that of the debtor be in someone else or be

Law Offices of
John C. Arnick P.A.
Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 296-1970

in dispute, or if the property has been disposed of by the debtor in fraud of creditors, in such a way as that it cannot promptly be reached by execution on the order of the Court, then a receiver may be appointed at once." Clark on Receivers, Section 221 at 333. This is entirely consonant with Md. R. 628d.

It is clearly apparent from the matters set forth in the Petition, and detailed in the Memorandum of Facts (based upon examination of Defendant's officials under oath), that Defendant has devised a scheme to insulate itself from its wrongdoing. Without the relief requested, the Plaintiff will be unable to collect his just judgment.

Defendant and its front organizations are headquartered in New York City. However, as Exhibit C plainly shows, contrary to the sworn statements of Defendant's local officials, substantial amounts of money are raised in Maryland and transmitted by Western Union to New York.

As the latest case decided under Md. R. 628 shows, this Court cannot summarily determine at this point that the Defendant has made fraudulent transfers, and allow the receiver simply to seize (and sell) assets in apparent third party hands for Plaintiff's benefit. The Court can, however, appoint the receiver to take all appropriate action concerning such property, and allow the third parties opportunity to litigate rightful possession. The case, Melba Investors Atlantic, Inc. v. Mimi Selig Homes, Inc., is attached.

Respectfully submitted,

John C. Armor
Attorney for Plaintiff

Of Counsel:

Philip L. Marcus, Esq.

Attach 1 Wire of Melba v. Gilman - L.R.

Jan 30, 1980

Court of Special Appeals of Maryland

No. 194, September Term, 1979 — Filed November 14, 1979

MELBA INVESTORS ATLANTIC, INC. ET AL.

v.

MIMI SELIG HOMES, INC. ET AL.

Appeal from the Circuit Court for Worcester County, Lloyd L. Simpkins, Judge.

Argued by *H. Michael Hickson*, with whom was *John C. Nason* on the brief, for appellants.

Argued by *M. Michael Cramer*, with whom were *Levitan, Ezrin, Cramer, West and Weinstein, Chartered* on the brief, for appellees.

Argued before GILBERT, C. J.; COUCH and MacDANIEL, JJ.

M.R. 628 Supplementary Proceedings — Property Disputes — Receiver

Appellants appeal from a supplementary proceeding order authorizing the appointment of a receiver to sell certain real property to the judgment debtor, which had been transferred by the judgment debtor to a third party during the progress of the litigation between the judgment debtor and creditor. The third party claimed title to the property.

HELD: No jurisdiction under supplementary proceedings to try property disputes. A receiver appointed under the rule must serve the interest of all creditors, not just the judgment creditor.

Order affirmed in part and vacated in part.

GILBERT, C. J. —

THE LAW

A judgment creditor may, pursuant to Md. Rule 628 a and d, seek the appointment by a circuit court of a receiver for the judgment debtor at anytime "after the expiration of sixty (60) days from the entry of any final judgment . . . where said judgment has not been paid or satisfied. . . ." The appointment of the receiver by a law court is proper even though the appointment is in the nature of equitable relief. *Wolcott v. Quick*, 253 Md. 543, 253 A.2d 521 (1969); *Housing Equity Corp. v. Joyce*, 31 Md. App. 18, 354 A.2d 445 (1976).

Once the receiver is appointed, his or her role is "to protect the rights not only of the petitioning creditor but the rights of others." 4 Poe, *Pleading and Practice* § 707 A at 365 (6th. ed. H. M. Sachs, Jr. 1975). No matter how "numerous the proceedings against the judgment debtor may be, the statutes generally provide that only one receiver shall be appointed, or, in other words, the same person must act as receiver in all the cases." Freeman, *Law of Executions* § 419 at 2240 (1900). If the rule were otherwise, the receivers might well find themselves at cross-purposes, generating more problems than they solve.

> "From the time of his appointment, the receiver in supplemental proceedings represents both the judgment creditor and judgment debtor, and is also considered as a general trustee for all the creditors of the judgment debtor. Like other trustees, his acts in contravention of his trust will not be permitted to injure the beneficiaries." 3 Freeman, *supra* at 2243. (Footnotes omitted.)

Freeman notes that "[t]he title [to the judgment debtor's property] vested in the receiver . . . is that only which the debtor had at the time of the appointment [of the receiver]." *Id.* at 2244. (Footnotes omitted.)

Mimi's motion for the appointment of a receiver, the hearing judge appointed a receiver and directed him to sell the Antigua property and to apply the proceeds to Mimi's lien.[5] Melba and 85th Street appealed.

The pleadings, on their face, showed that the judgment against 85th Street had remained unpaid for more than sixty (60) days. Md. Rule 628 a. The hearing judge properly appointed a receiver for the assets of 85th Street as he was empowered to do under Md. Rule 628 d. Had the hearing judge done so and cloaked "the receiver with authority to prosecute such course or courses of action as the receiver, within the ambit of the order appointing him . . . deem[ed] appropriate," we would have no hesitancy in affirming the order "across the board." *Housing Equity Corp., supra* at 24. The judge, however, did not stop with the appointment of the receiver. Instead, he decided that *lis pendens* applied to the instant case and then proceeded to grant "[t]he relief requested." The "relief requested" far exceeded the scope of Md. Rule 628 and, of perhaps more import, creates a receiver with a built-in conflict of interest. The "relief requested" was that:

> "the Court . . . appoint a receiver to sell the real property in question and described as:
>
> All that fee simple tract or block of land situate, lying and being between 85th to 86th Steets from the Coastal Highway to the Atlantic Ocean, Ocean City, Worcester County, State of Maryland;
>
> and distribute the proceeds of sale to the plaintiff [Mimi] to the extent necessary to satisfy the judgment rendered in favor of the plaintiff [Mimi] herein."

We modify the order appointing a receiver by vacating that portion of it that vests the Antigua in the receiver. We remand to the circuit court for the passage of a supplemental order properly cloaking the receiver with the necessary powers to perform his duties for the benefit of all the creditors as well as the judgment debtor.

Order affirmed in part, vacated in part, and remanded for the passage of a supplemental order consistent herewith. Costs to be divided equally between the appellants and the appellees.

(1) From the record it is manifest that Melba is a "creature" of Banker's Trust of New York, the construction money lender. In short, Melba appears to be Banker's alter ego.

(2) For purposes of this appeal, the relevant portions of the declaration are *ex contracta*.

(3) Such service is permitted pursuant to Md. Rule 106 e.

(4) The articles of Sale and Transfer are dated October 29, 1977, and were filed on November 16, 1977.

(5) Such a procedure would be improper in view of the fact the record reflects more than one creditor, and the receiver is *a receiver for all the creditors* not just Mimi.

(6) Freeman explains, "[T]here is no authority conferred by statute upon the court to make any order requiring the delivery of the possession of such property. . . . [I]f the debtor refuses such delivery, the receiver, or any purchaser from him, must resort to some appropriate action to enforce his title and right of possession." *Id.* *See* Md. Rule 628 e — Contempt.

receiver] The chief object of the receivership may be to reach and subject to execution property fraudulently transferred." *Id.* at 2245.

What we have said will serve as background for a better understanding of why we shall herein affirm the action of the Circuit Court for Worcester County in appointing a receiver on petition of Mimi Selig Homes, Inc. (Mimi), appellee, for the assets of the appellant, 85th Street Development Company (85th Street), currently possessed by Melba Investors Atlantic, Inc.[1] (Melba), and vacating the hearing court's order vesting title in Melba's receiver.

THE FACTS

On May 15, 1973, Mimi, a real estate brokerage firm, entered into two written contracts in the form of listing agreements with 85th Street, owner of the Antigua condominium then under construction in Ocean City, Maryland. Mimi was granted the exclusive privilege to represent 85th Street for the sale of condominiums and was to receive in return, commissions of 4%. Mimi procured several purchasers and incurred incidental expenses. When the earned commissions remained unpaid for almost three years, Mimi filed a four-count declaration in the Circuit Court for Worcester County.[2] Over the course of the next five months, Mimi made attempts to serve 85th Street with process. Finally, in September 1976, service was effected by serving the State Department of Assessments and Taxation of Maryland.[3] That agency's effort to notify 85th Street by certified mail was rebuffed by the addressee.

Default judgment was entered against 85th Street on May 25, 1977. Meanwhile, on December 8, 1976, three months after constructive service, by way of service on the State agency, 85th Street conveyed its interest in the Antigua to Melba.[4] The deed reflecting the transfer was recorded in Worcester County five days later. After the default judgment was entered, 85th Street unsuccessfully sought to set it aside. The default judgment was extended on inquisition and resulted in a judgment absolute against 85th Street in the amount of $17,136. More than two months after the entry of the judgment absolute, it having remained unsatisfied, Mimi pursuant to Md. Rule 628 (d), filed a motion for special relief. Mimi requested the appointment of a receiver to dispose of real property described as the Antigua and belonging to 85th Street and to use the proceeds of the disposition to satisfy, to the extent necessary, Mimi's judgment.

Melba was allowed to intervene

The order is unique for several reasons. Were the receiver to follow the command of the order, he would, of necessity, have to treat Mimi as a preferred creditor, because the order specifically directs that Mimi be paid "to the extent necessary to satisfy" its judgment against 85th Street. We have already seen that a receiver serves all the creditors not just the interests of the petitioning creditor. Hence, if the receiver does what the order says, he may well find himself confronted with accusations by the other creditors of derogation of duty to protect their interests.

Additionally, even if the receiver could comply with the order of court, the order makes no provision for the disposition of the sale proceeds that are in excess of a sum sufficient to satisfy Mimi, if indeed there be such proceeds.

Furthermore, the order usurped the receiver's discretion by depriving him of the right to determine the best course of action to follow in order to protect the rights of all the creditors as well as the judgment debtor. 3 Freeman, *supra*.

We note that it is well settled that in the context of Supplementary Proceedings the hearing judge is not vested with the power to try title to land. *See* D. Joseph, E. Ottenheimer, *Collection of Money Judgments in Maryland Through the Medium of Supplementary Proceedings* at 123 (1955). Freeman, in his treatise on the *Law of Executions*, declares, "In so far as the order seems to determine conflicting claims of title, or to require the delivery of property adversely held, or to authorize the receiver or other officer to take possession of it, it is beyond the jurisdiction of the court and void. . . ."[5] § 418 at 2233.

By invoking the doctrine of *lis pendens* in an effort to recapture the assets of 85th Street, the judge effectively resolved a title dispute regarding the Antigua as between Melba and Mimi, an entirely separate legal claim on which Melba is entitled to a full plenary hearing. "If the person cited to appear [intervene] denies that he is indebted to the judgment debtor, or asserts an adverse claim to property confessedly in his profession, but which is alleged to belong to such debtor, it is doubtful whether any judge or court can be authorized, in a summary proceeding, and without giving the person summoned [intervening] the benefit of a trial by jury, to determine the issues thus presented, and, if found against the claimant, compel him to pay the debt or deliver the property for the purpose of satisfying the judgment." Freeman, *supra* at 2231.

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN	*	
Plaintiff	*	
v.	*	1975/387/18960
U.S. LABOR PARTY	*	
Defendant	*	

* *

PETITION FOR SPECIAL RELIEF FOR JUDGMENT CREDITOR

Grenville B. Whitman, Plaintiff, by John C. Armor, his attorney, petitions this Honorable Court grant him special relief as requested in detail at the foot of this petition, pursuant to Md. R. 628d., and alleges:

1. Judgment herein was rendered in the amount of $30,000, together with interest and costs, in favor of Plaintiff against Defendant, U.S. Labor Party, on October 4, 1977. This judgment remains unpaid despite the passage of more than two years.

2. Defendant is an unincorporated association in the nature of a political party headquartered in New York City and with branch offices in Baltimore City and about 35 other cities in the United States.

3. The three principal officials of Defendant in Baltimore (Mr. Lawrence Freeman, Mrs. Debra Freeman, and Mr. Robert Primack) were examined under oath pursuant to Md. R. 628a. on July 11, 1979. A certified transcript ("the transcript") of that proceeding is being filed with the Clerk of this Court simultaneously with the filing of this petition.

JCA:mks
2/15/80

4. Examination of the transcript reveals that:

a. Defendant purports to be essentially without funds;

b. Defendant purports to operate in a completely informal manner, without dues, membership lists, membership criteria, financial records, or Maryland bank accounts;

c. Defendant conducts extensive activities in Maryland of a political education nature, conducts meetings, has office space, and sells a twice-per-week political newspaper known as New Solidarity;

d. Defendant has sponsored candidates for various political offices (local, state, and national) in Baltimore City;

e. Local party officials' salaries, the office rent, and other expenses are paid by organizations ("the organizations") known as New Solidarity International Press Service, Inc., Campaigner Publications, Inc., the National Caucus of Labor Committees, the Fusion Energy Foundation, Citizens for LaRouche, Committee to Elect LaRouche, the Committee for Fair Elections, the Labor Organizers Defense Fund, Computron Technologies, Inc., World Composition Services, PMR Associates, and others;

f. Funds accumulated by the Defendant are directly and daily transferred to one or more of the organizations;

g. Each of the organizations is headquartered in New York City and shares management, office space, and other facilities with the Defendant, and has for some years;

h. Each of the organizations shares office space, personnel, and other facilities with the Defendant in Baltimore City,

and has for some years;

i. The Defendant has, thus, by a fraudulent scheme, attempted to shield itself and its activities from the practical effect of judgments, including that of Plaintiff, arising from its libelous and other tortious activities.

5. In addition to matters revealed by the transcript, the teletype print-outs attached as Exhibit C, show that the Defendant and its officers collect and comingle in Maryland funds for the following purposes: contributions and loans to the U.S. Labor Party, contributions to LaRouche (A Democratic Candidate for President), materials sold for Fusion Energy Fund (an incorporated so-called charity in New York), and Campaigner Publications, Inc. (an incorporated, profit-making enterprise in New York).

6. All of the matters set forth in paragraphs 4 and 5 of this petition are set forth in greater detail in the accompanying "Memorandum of Facts".

7. By way of additional background, Plaintiff re-alleges those matters set forth in two articles from recent editions of the New York Times, which are annexed hereto and collectively marked Exhibit F.

8. Plaintiff submits herewith a Memorandum of Authorities for the relief requested in this petition.

9. Lawrence Freeman, of 4004 Linkwood Road, Baltimore, Maryland 21218, is, as is shown in the "Memorandum of Facts," principal official in Maryland of Defendant and of each and all of the organizations. None of the incorporated organizations has a resident agent in Maryland.

For these reasons, Plaintiff requests the Court pass orders:

A. Appointing a receiver to inventory, conserve, secure and manage all property and credits of the Defendant,

for the benefit of the Plaintiff and all other creditors of Defendant; and,

B. Empowering the receiver to take whatever steps he considers necessary, in the appropriate legal forum, to recover any assets of the Defendant, transferred to any third party, in order to defraud the Plaintiff and all other creditors of Defendant; and,

C. Directing that such Show Cause Order as may issue hereunder be served upon Lawrence Freeman, and also on the Maryland Department of Assessments and Taxation, with respect to the corporations doing business in this State through the officers and members of the Defendant; and,

D. Granting such other and further relief as the circumstances may equitably require.

Respectfully submitted,

John C. Armor
Attorney for Plaintiff

Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

Of Counsel:

Philip L. Marcus

2617 Guilford Avenue
Baltimore, Maryland 21218
(301) 889-3890

U.S. Labor Party: Cult Surrounded by Controversy

The following article is based on reporting by Howard Blum and Paul L. Montgomery and was written by Mr Montgomery:

Last month in New Hampshire a mild-looking economic theorist named Lyndon H. LaRouche Jr. began his 1980 campaign for President of the United States, escorted by expressionless security men from the U.S. Labor Party, the cult-like organization he has created over the last decade.

Mr. LaRouche first gained attention during the 1968 Columbia University strike, when he attracted students a generation younger than he and formed the National Caucus of Labor Committees. In the decade that followed, he has turned

First of two articles.

that organization and its political arm, the U.S. Labor Party, away from Marxism to the extreme right and — despite the presence of many Jewish members — to anti-Semitism. The organization no longer advocates a workers' state, and its members now dominate a multimillion-dollar-a-year business. According to charges by former party members in a pending lawsuit, the business channels money to Mr. LaRouche's U.S. Labor Party.

Along the way — according to former party members and, in some cases, to party publications, internal party records and law-enforcement officials —

Continued on Page 16, Column 1

Continued From Page 1

members of the party have initiated gang assaults at rivals' meetings, taken courses in the use of knives and rifles at an "anti-terrorist" school and produced private intelligence reports on anti-apartheid groups in the United States for the Bureau of State Security of South Africa.

The party has also brought members from its branches in West Germany and Mexico to a farm in upstate New York for training in guerrilla warfare, according to former party members who say they participated in the training.

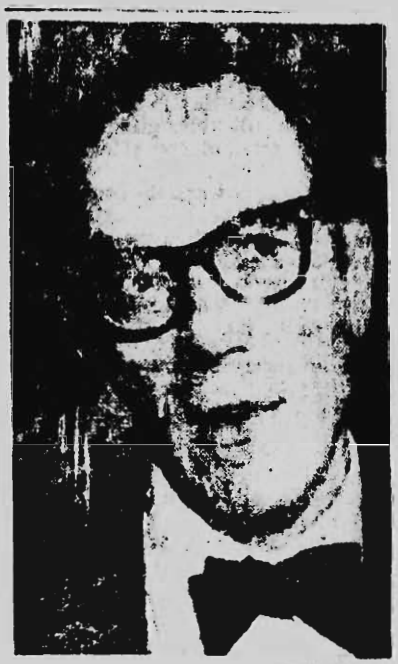
For some, the U.S. Labor Party is one of many sects at the far fringe of American politics, unworthy of serious attention. But for opponents of the party who believe themselves the targets of systematic harassment, the party is a menace that received 27 percent of the vote in a local election in Seattle and that should be closed off from its latest goal — getting matching funds from the Federal treasury for Mr. LaRouche's Presidential campaign.

The 57-year-old Mr. LaRouche runs his operation from a closely guarded headquarters occupying the entire floor of an office building off Columbus Circle — at 304 West 58th Street. This year, through airport sales of its publications, fund-raising drives among members and income from successful computer and printing companies, the U.S. Labor Party is expected to raise more than $4 million for Mr. LaRouche's varied projects.

What follows is based on public records, on party documents and literature and on interviews with former members of the U.S. Labor Party, none of whom wanted to be named. Some said they feared for their lives, some said they feared harassment for themselves or their spouses still inside the party and some seemed embarrassed at what they now regard as another life.

A New York Times inquiry into the activities of the 1,000-member core of the party, who are scattered among 37 listed offices in North America and 26 in Europe and Latin America, has found the following:

¶Party members have a dominant role in three Manhattan companies that, according to informed estimates, together have revenues of perhaps $5 million a year. The companies are the Computron Technologies Corporation, at 810 Seventh Avenue, a programming concern that includes Mobil Oil, Citibank, Bristol-Myers and A.T.&T. among its clients; World Composition Services, at 432 Park Avenue South, which has one of the most advanced computer typesetting complexes in the city, and work for the Ford



Associated Press

Lyndon H. LaRouche Jr., founder of the U.S. Labor Party and its Presidential candidate, in 1980.

Foundation and major publishers, and PMR, at [illegible] Street, a job printer that produces the party's publications as well as outside work for [illegible]. According to an affidavit in a pending lawsuit by two former party members, at least three individuals [illegible] the U.S. Labor Party [illegible] from Comptron goes, unreported, to the party. The unreported [illegible] from business to a political party is a potential violation of federal campaign law.

Corporate officers from all three companies denied any links to the Labor Party and refused repeated request for interviews.

¶During the 1976 [illegible] party volunteers [illegible] reports on [illegible] to the Federal Bureau of Investigation and local police [illegible]. In 1977 the group attempted to [illegible] its intelligence network [illegible] former members, [illegible] groups were prepared [illegible] student dissidents [illegible] the Shah of Iran [illegible] nuclear movement [illegible] power companies.

¶[illegible] a statement to the members [illegible] he is "targeted [illegible] various committees [illegible] to the [illegible] England, [illegible] the Council

EXHIBIT F-2

on Foreign Relations, the Justice Department and Mossad, the Israeli security agency. Recently, at least eight members of the party have undergone intensive training in "anti-terrorist" techniques at a camp in Powder Springs, Ga., that is operated by Mitchell L. WerBell 3d, an international arms dealer who has served as adviser to Latin American dictators, inlcuding Fulgencio Batista and Anastasio Somoza.

During World War II, Mr. WerBell was a guerrilla fighter for the Office of Strategic Services and he says he still has close ties to the Central Intelligence Agency. According to Mr. WerBell, the training at his camp — costing $[illegible] a day per person for six days — involves rifle, knife and pistol use for defense against assassination.

¶Officers of the party exchange information nearly daily with Roy Frankhouser of Reading, Pa., who calls himself the Grand Dragon of the Ku Klux Klan in Pennsylvania and who has also been active in the American Nazi Party. Mr. Frankhouser worked briefly as an informant for the Alcohol, Tobacco and Firearms Bureau and also says he has served with the C.I.A. and the F.B.I. (The policy of both Federal organizations is not to comment on undercover agents.)

In 1975, Mr. Frankhouser was convicted in Federal court of conspiring to sell a half a ton of stolen dynamite and received five years probation. He has also marched on Fifth Avenue in a black Gestapo uniform. On a number of occasions, Mr. LaRouche has cited Mr. Frankhouser as a "high intelligence source."

¶The party has formed "anti-drug coalitions" in a dozen cities that are used as vehicles for spreading Mr. LaRouche's theories that British intelligence and "Zionist drug" control the world's narcotics trade. In many cases, people listed as members of the coalitions have said their names were used without permission, and in some cases they have said because they learned of the party's connection with the groups or [illegible] anti-Semitic attitudes, their names still remain.

¶Another group, [illegible] Labor Party — the [illegible] dation, which advocates [illegible] has been approved [illegible] tion by the Internal [illegible] All money gathered [illegible] the field through [illegible] tion's publications [illegible] from utilities and [illegible] transfers of money [illegible] ters. The foundation [illegible] return that no [illegible] $135,687 was used [illegible]

¶The party encourages its members to take jobs outside the party to advance the group's private [illegible] For example, [illegible] Relations, a successor to [illegible] active member of [illegible] Among the speakers [illegible] was to attend the [illegible] Society, an [illegible] the world's industrial [illegible] of the meeting [illegible] discussion of [illegible] trends.

"I'm absolutely floored by this," said William F. Bundy, who employed the woman for part of her time at the Council, when told of her party connection. "It's like the C.I.A. getting an agent into the Politburo."

Party leaders, were offered an oppor-



The party's symbol

[illegible] to the findings, but they [illegible] with the reporters work-

[illegible] harasses [illegible] regards as un- Detroit freelance reporter [illegible] investigation of the group [illegible] week that people living on [illegible] received a leaflet inviting [illegible] Out Party" at his

[illegible] Party also published a [illegible] or potential assassins [illegible] a threat to it. In 1977, [illegible] was in West Ger- [illegible] himself to be a target [illegible] the party's [illegible] New Solidarity [illegible] people, most of [illegible] writing partici- [illegible] bloodbath deploy- [illegible] believe the [illegible] security adviser, [illegible] successor to [illegible] chief conspira- [illegible] in the United

Members Arrested

In an accompanying article on what he called "Operation Counterterror," Mr. LaRouche said: "I am playing the game according to the following rule: My moves will be such that if a hit against me occurs the evidence will be irrepressible and will lead my friends to rapidly bring down the Carter Administration and very highly placed forces in several countries presently complicit in international terrorism."

Over the years, members of the U.S. Labor Party and its predecessors have been arrested on a variety of criminal charges — kidnapping, possession of guns, assault — but there have been few convictions. The group began with professions of nonviolence and Mr. LaRouche still frequently espouses that cause, saying members act only in self-defense. Its involvement with weapons training and military-style maneuvers was known only to the inner circle of the leadership and those selected to participate.

According to former members and incidents described in party publications, a frequently used tactic — particularly when members are selling the group's literature or disrupting meetings of other organizations — is to try to incite violence through insults.

"Those guys are really maniacs," said one former member. "I've seen them. If you don't buy a paper you're a pig or smell bad or they call you a Nazi. They get two inches from a person's face and cut them to pieces. They can get anybody to hit them in a second. They love it, getting bloody. They talk about it all the time."

File Assault Charges

When members do elicit a reaction, they file assault charges and include the incident in accounts of "assassination attempts." Recently, when a young man charged the party's literature table at Newark Airport shouting "Sieg Heil," New Solidarity, the group's newspaper, said the incident was connected with international terrorism.

The party has been the subject of surveillance and investigation by a number of law-enforcement bodies. The Federal Bureau of Investigation had an open file on the group for seven years, including use of at least two informants within the organization.

The case was closed by the F.B.I. in 1977 under new Federal guidelines prohibiting domestic political surveillance in the absence of evidence of specific illegal acts. Mr. LaRouche and the party have a lawsuit pending against the F.B.I. and have won a court order prohibiting the bureau from discussing the party with news reporters and also releasing 5,000 pages of F.B.I. documents about the group previously released under the Freedom of Information Act.

EXHIBIT F-3

The party also has a suit pending against the Federal Election Commission. The commission denied Mr. LaRouche $110,000 in Federal matching campaign funds in 1976, charging irregularities in the reporting of contributions. The group is again seeking Federal funds for 1980 and says it already has the necessary contributions from six of the required 20 states.

Members who have recently left the party say its full-time membership has been shrinking since its turn to the right and anti-Semitism about three years ago. These sources say the membership core of the party reached a high of 2,500 in 1975, compared with about 1,000 now. Despite the turn toward anti-Semiticism, there are still many Jewish members of the group, including high-ranking members of its intelligence and security sections.

Link Zionists and Nazis

Among statements that appear in party publications or in articles written by Mr. LaRouche are such as, "Zionist circles funded the founding and continuation of the American Nazi Party" and "Israel is ruled from London as a zombie-nation." The party's newspaper has printed that "only" a million Jews died in the Holocaust.

For those inside the ruthless structure of the party, a closed but highly psychological and social structure, life moves from crisis to crisis as Mr. LaRouche announces new plots of assassination or looming thermonuclear war. "Every few weeks there's a new reality, different from the one before but just as absolute," said a former member. "It seems like the system was designed so that people have no time to think."

Mr. LaRouche brooks no questioning of his revelations. "All previous reality is canceled," he once said in arguing one of his points. "People who don't believe this have resigned from the human race," is another of his frequently stated sentiments.

Members of the U.S. Labor Party are expected to be neatly dressed and groomed. Men are clean-shaven, conservatively barbered and well-tied. In many cases, wives of the women who party members live with work full-time at outside jobs so their partners can devote full time to the party. Some officials get stipends for living expenses, but most members are expected to support themselves.

Members' Financial Obligations

The former members said that all members' salaries and wages are at the service of the party. At least five members are known to have each given more than $100,000 of their own money to the party during their membership. Members routinely are asked to take out substantial loans and give the money to the party. The party makes the loan payments, but if the member quits, he remains responsible for the balance — an incentive for some to stay.

Psychological pressures are great. Often party officials pick the person a member is to live with. If a member wants to leave the group, his partner is ordered to live apart from him. Mr. LaRouche has published his own psychological theories, which feature discussions of impotence, fear of homosexuality and denigration of women.

Mr. LaRouche's style is considerably less Spartan than that of his followers. He travels extensively, lives well and recently returned from Europe on the Concorde. His apartment in [illegible] is valued at the group's property [illegible] $500 a month and, according to several former members who saw it, is patrolled with a shotgun stationed just inside the front door.

The party's founder has conducted gruelling group sessions to keep members in line. According to the accounts of former members, [illegible] no doubt Mr. LaRouche's are summoned before a small group and grilled about their fears and guilt until they break. Husbands or wives are asked about their partners' sexual practices.

In one case, former members said, a man was ordered by Mr. LaRouche to stop having sexual relations with his wife because he was becoming "politically impotent."

Called 'Diabolical'

One woman who resigned from the group after several such sessions described them in a statement circulated to members as "diabolical," leading to "deep-seated feelings of self-hatred and worthlessness." She wrote that, under Mr. LaRouche's control of the sessions, high-ranking members were "transformed into animals unfit for vying for the leader's approval."

Tomorrow: The Founder

THE NEW YORK TIMES, MONDAY, OCTOBER 8, 1979

EXHIBIT F-4

One Man Leads U.S. Labor Party on Its Erratic Path

The following article is based on reporting by Howard Blum and Paul L. Montgomery and was written by Mr. Montgomery.

While the philosophy of the U.S. Labor Party has shifted dramatically over the last decade — from its roots in the left-wing student movement of the late 1960's to the cult-like right-wing political organization that it is today — one man has always been central to the party and its policy: its founder, Lyndon H. LaRouche Jr.

The 57-year-old Mr. LaRouche, the party's 1980 candidate for President of the United States, controls the activities of

Second of two articles.

the organization, which has 1,000 core members scattered among 37 listed offices in North America and 26 in Europe and Latin America.

According to former party members — and, in some cases, party literature, internal party documents and law enforcement officials — the party members, under Mr. LaRouche's leadership, have initiated gang assaults at rivals' meetings, taken courses in the use of knives and rifles at an "antiterrorist" school and produced private intelligence reports on antiapartheid groups in the United States for South Africa. Members have also been trained in guerrilla warfare at a farm in upstate New York.

Federal Election Funds Sought

At present the party is preparing to spend on Mr. LaRouche's 1980 candidacy for the Presidency a large part of the $4 million it is estimated to raise each year, and it is seeking Federal matching funds for the campaign.

Since the beginning of his campaign, Mr. LaRouche has altered his biography to eliminate references to such matters as his conscientious-objector status until near the end of World War II and his 30 years of leftist political work. He has also stopped using the pseudonym Lyn Marcus or L. Marcus, by which he was known in his organizations before 1973.

Mr. LaRouche was born in Rochester, N.H., in 1922 and grew up in Lynn, Mass., where his father was a management consultant in the shoe industry. His mother, who died last year, ran a fundamentalist Quaker meeting in the Back Bay section of Boston.

From 1948 to 1963, Mr. LaRouche, then known as Marcus, was active in the Socialist Workers Party, a Trotskyite group. In the 1960's he appeared in various movements in New York as a management consultant. In 1969, a year after he formed the left-wing National Caucus of Labor Committees at Columbia University, the group and its 30 members were expelled from Students for a Democratic Society and set out on their own.

Until 1972, the group, known familiarly as the Labor Committee, was unnoticed, and its members were almost exclusively young people of upper middle-class background who believed that Mr. LaRouche's Marxist theories and attempts to organize workers during strikes and the like provided the best opportunity for socialism.

The Labor Committee began to undergo dramatic changes in the middle of 1972, when Mr. LaRouche's second wife left him for a young English member of the party living in London. Mr. LaRouche spent several months in West Germany and returned with what one former member described as a messianic vision. Whereas internal debate and discussion had previously characterized the Labor Committee, the leader began making dictatorial pronouncements. Those who disagreed were said to be either Central Intelligence Agency agents or afraid of their mothers.

Mr. LaRouche began forming ideas of a vast conspiracy against him, led by the Rockefeller family and anything having

Continued on Page B5

Continued from Page B1

to do with England. He spent much of his time in his bathrobe in his New York apartment, surrounded by a security force. Cartons of canned food, acquired for a "siege" lined the halls.

Upon his return to New York, Mr. LaRouche announced to the membership, without consultation with the party's executive committee, Operation Mop-Up. It was a two-month period of violence in March and April 1973, in which Labor Committee gangs attacked Communist Party members, disrupted meetings of many left wing groups and attempted to intervene in strikes to assert Mr. LaRouche's "leadership" of the Left. According to former members, some participants carried guns and attempts were made to acquire a cache of weapons.

Guerrilla and Terrorist Training

This was also a period of guerrilla and terrorist training, which began at a hunting lodge in Pennsylvania and was continued at a farm the group acquired near Salem, N.Y., according to former members who led and participated in this training. A report on the guerrilla training sessions was filed, according to a law-enforcement official, by a party member who was an informant for the Federal Bureau of Investigation.

Classes were given by Vietnam veterans and European members who had had military or Communist underground experience. According to several who participated, the techniques taught included garroting, knifing and booby trapping, small-unit maneuvers and the usual toils of boot camp.

According to former members, about 50 current members of the U.S. Labor Party have undergone aspects of the training.

Mr. LaRouche repudiated violence again in 1974 and has persistently denied that the training sessions took place, though the group has acknowledged giving courses in "unarmed self-defense."

EXHIBIT F-5

Weak Showing at the Polls

Around [illegible] the party swung much of its effort to electoral politics. In Mr. LaRouche's 1976 Presidential campaign, for which the party claimed $180,000 in expenses, he was on the ballot in 24 states and the District of Columbia and got 40,043 votes out of 80 million cast. Virginia provided the most votes with 7,508, followed by New York with 5,413, Massachusetts with 4,922 and Ohio with 4,335.

As it says does after electoral defeat, the party claimed voting frauds. A Committee for Fair Elections was established, and the party instituted lawsuits in New York, Ohio, Wisconsin and Pennsylvania.

Though the Republican National Committee declined to give blanket endorsement to the legal effort, individual Republicans associated with conservative causes took part or contributed funds. In Wisconsin, where the Republicans also were charging voting irregularities, the state G.O.P. briefly joined the U.S. Labor Party suit because it was the only state challenge suit filed before the legal deadline.

The U.S. Labor Party has already raised more than $100,000 for 1980 and has conducted fund-raising appeals on television and in newspaper advertisements. According to statements filed with the Federal Election Commission, most of Mr. LaRouche's expenses are payments to political businesses that are dominated by party members. These include payments to Mr. LaRouche for President Committee for research, services, rent at the headquarters at 304 West 58th Street and secur[illegible]

'As American as Apple Pie'

In campaign appearances, Mr. LaRouche declares himself "the candidate who's as American as apple pie" and says he has declared war on liberalism. He promises lower taxes, higher incomes and a drug-free society, and he advocates nuclear power, a gold standard and accumulation of development capital through social cuts. The attacks on alleged British and Soviet conspiracies that fill his party publications are not mentioned.

The party has been repudiated by many elements of the Right, including The National Review and the John Birch Society. A frequently cited suspicion is that the group harbors pro-Soviet beliefs. The New Right Report, a conservative newsletter, made this observation in January: "Many of the operations which bring in money to LaRouche cleverly conceal their origins in order to appeal to average American businessmen. We find this group very bit as weird as Marxist Rev. Jim Jones' Peoples Temple."

The party, however, continues in its attempts to get attention at conservative gatherings through leafleting, telephoning members, asking questions at forums and sending representatives of its publications to news conferences. One recent internal Labor Party document, headed "Put LaRouche in the National Limelight," advised organizing efforts at conventions of the Catholic Youth Organization, the Knights of Columbus and the Sons of Italy and made this analysis of the Catholic Daughters of America: "This group overlaps Daughters of the American Revolution membership but better, non-Anglophile. This is key to perhaps getting before the D.A.R. national convention in April 1980."

A Meeting With General

Maj. Gen. John K. Singlaub, who acquired a cachet with conservatives when he was forced into retirement after disagreeing publicly with the Carter Administration's military policies, had a brief contact with the party. He says the party approached him to request an opportunity to "brief" him on its program.

He met with two party officials at the home of Mitchell WerBell, an old friend, in Georgia. Mr. WerBell is an arms dealer and former member of the Office of Strategic Services who says he still has close ties to the C.I.A. He trains members of the Labor Party at his Georgia farm in what he described as "sophisticated anti-terrorist techniques." These techniques, according to Mr. WerBell, include [illegible]rate, riflery and knife fighting.

General Singlaub says he has since rejected the organization. "It was so clear to me after the first three or four contacts that they wanted something from me," the general said. "They hounded me for months, they flooded me with documents, they showed up at places where I spoke."

"I think they're a bunch of kooks of the worst form," General Singlaub went on. "I've been telling WerBell that if they're not Marxists in disguise, they're the worst group of anti-Semitic Jews I've encountered. I'm really worried about these guys; they seem to get some people."

The general was asked if any mention was made in his talks of the possibility of a military coup in the United States -- an idea that has recently received currency in the party as a way to put Mr. LaRouche in power.

Military Thrust Suggested

"Well, it didn't come up in that form, but it was suggested that the military ought to in some way lead the country out of its problems," General Singlaub replied. "I guess I stepped on them pretty hard in that, and it never came up again. It was one of the first things that made me suspicious that a bunch of kooks."

The party's extensive activities and expensive communications — two 24-hour Telex and data lines to the party's headquarters in Weisbaden, West Germany, for example — led critics to suppose that there was some secret source of funds. The Left, knowing of the Operation Mop-Up period, thought — and in some cases still thinks — that money must come from the F.B.I. or the C.I.A., though there was no proof.

Foreign governments, such as the Soviet bloc or Iraq, have also been mentioned. Mr. LaRouche said in newspaper interviews in 1975 that he had expected to get money from Iraq for his activities but never did.

With the success of the party's covertly held businesses and Mr. LaRouche's public campaign drives, appeals to members for funds have declined. Fund raising now appeals to be directed mainly to businessmen. One party activity, for example, is publication of a weekly economics magazine called Executive Intelligence Review, whose subscription price is $400 a year. The review, in its brochure, says that rates will also be quoted for "special research reports and specialized confidential consultation."

Revenue From Publications

Much of the revenue for daily activities comes from sale of the publications by members — the party calls them "organizers" — at airports and shopping centers. Included in the offerings are Mr. LaRouche's analysis of Judaism as "a cult founded by the Babylonians" and a thick paperback book charging that Jews dominate the narcotics trade and Jewish bankers provide the capital.

Despite this literature, the party has many Jewish members who were originally recruited from the student movements of the late 1960's.

The party's anti-Semitic turn appears to date from one of its first right-wing contacts — a mass circulation newspaper called Spotlight, published by the Liberty Lobby. The Liberty Lobby has been engaged, as is the Labor Party, in lawsuits against the Anti-Defamation League of B'nai B'rith.

In its Oct. 11, 1976 issue, Spotlight printed a review of a Labor Party publication called "Carter and the Party of International Terrorism," which included computer "grids" prepared by Computron of opponents of the party. Computron is a multimillion-dollar computer systems business that was originally formed by Labor Party members, and many of the executive officers of the busi-

EXHIBIT F-6

ness still maintain close ties to the party.

The review of the Labor Party book was favorable: "Although few readers of Spotlight will agree with all of the judgments that this book contains, and many will also wonder why some of the major Zionist groups such as the notorious Anti-Defamation League, are not included, it represents a massive job of research."

Swing to Anti-Semitism

Following that review, the Labor Party began to include Zionist groups and Jews in its analyses of conspiracies, and it also initiated an acrimonious campaign against the Anti-Defamation League. Among the party's efforts was the founding of an organization called "The Provisional Committee to Clean Up B'nai B'rith." The committee sought funds from the public.

Mr. LaRouche and the party insist that they are anti-Zionist, not anti-Semitic.

A number of former members of the party were asked what kept their friends still tied to it. Some said it was political commitment, some the psychological influence of Mr. LaRouche, some cited the terror and disorientation that afflicts members who begin to doubt. Many members, having given up their families, their education and the society of their contemporaries, can find no other roots.

A young woman told about her lover whom she supported in his work for the party before both left. They had two friends with similar doubts, and the two women worked out a routine. They would give the men enough money to cover the cost of the Labor Party papers they were supposed to sell every day, so that the men would be free without risking the enmity of the group.

"They'd throw away the papers and go play pool or something," the young woman recalled. "Or sometimes they'd just go out to the airport and watch the planes take off, wishing they were on them."

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN	*	
Plaintiff	*	
v.	*	1975/387/18960
U.S. LABOR PARTY	*	
Defendant	*	

* *

MOTION TO SEAL THE RECORD

Now comes the Plaintiff, GRENVILLE B. WHITMAN, by his attorney, John C. Armor, and says:

1. The difficulty in obtaining service on the agents for the Defendant in the above case for Supplementary Proceedings is in large part a matter of record. Private process servers had to be used throughout the proceedings, and there were numerous non ests.

2. When the summonses were served to bring in the officials of the U.S. Labor Party in Maryland for examination under oath, their response was to file false assault charges against Mr. Whitman and the process server which were tried in the Northern District Court of Baltimore City on 20 June, 1979. The case against Mr. Whitman was dismissed by the Court without necessity of any defense, and the case against the process server resulted in a not guilty finding.

3. The reaction of the US Labor Party to the service of the above summonses, in addition to the charges referred to, was the issuance of yet another scurrilous statement attacking the Plaintiff, [illegible] attached as Exhibit G.

4. On information and belief, if the U.S. Labor Party has any idea in advance that the attached pleadings

have been filed, and are in the process of being served, especially if they know in advance what the content of these pleadings are, the Party and its officials in Maryland can be expected to do everything in their power to evade service.

WHEREFORE, the Plaintiff respectfully requests the Court to order the Clerk to seal the Motion for Receivership and all of its Exhibits, this Motion to Seal the Record, and attached Order beginning at the time they are filed with the Court, and ending immediately when the Plaintiff certifies to the Court that the papers have been served on Lawrence Freeman and on the Department of Assessments and Taxation.

Respectfully submitted,

John C. Armor
Attorney for Plaintiff

Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

Of Counsel:

Philip L. Marcus, Esq.

2617 Guilford Avenue
Baltimore, Maryland 21218
(301) 889-3890

EXHIBIT G

Whitman Caught In Terror Assault

We warned people who Grenville Whitman was once before. We exposed him when he was director of the drug-running Man Alive Methadone Maintenance Center. We exposed his ties to convicted terrorists like Weatherman leader Bernadine Dohrn and to the environmental terrorists who advocate blowing up nuclear power plants. We detailed that he was run through the same Johns Hopkins Zionist-intelligence networks as every single sub-human pig now being held in Italy for the kidnap and murder of Aldo Moro. We stopped Grenville Whitman from being elected to the City Council in 1975. By 1978, when he ran for State House of Delegates people knew who he was; he didn't have a chance. Now, he's washed up politically.

But he's still running the streets. And he's still in the middle of the same filthy networks - the enviromental terrorists, the ACLU, the Maoist rifraf. And now he's been caught for a vicious crime. On Monday, May 28, Grenville Whitman and an associate, Kenneth McElroy, hid for hours in a building next door to the district office of Debra Hanania-Freeman, congressional contestant for the 7th c. d. They were let in to the building and allowed to hide there by a Mr. Eisenberg. When Freeman left her office at 11 pm. Whitman and McElroy came out of the building running at full speed and screaming. They lunged at her. McElroy, whom she thinks had a knife, threw her to the ground. It was only the quick reaction of her husband and her friends, who managed to drag her back in, that prevented her from being injured more seriously, or possibly killed.

Why this brutal assault? Because Debra Hanania-Freeman represents a clear and vocal force that can free this city's population, particularly its black population, from 200 years of Zionist trade in human flesh. Whitman, like lame duck Congressman Parren Mitchell, is merely a lackey for the Zionist drug-terror networks that control Baltimore. Whitman, through drug running operations like Man Alive, is the white side of the Parren Mitchell goon appartus that controls the ghetto through terror and drugs. It's no coincidence that Parren and Grenville call each other "brother"; they share the same mother - the Zionist Lobby. Whitman, fearing that his controllers will cut him loose now that he's worn out his usefulness, made a desperate attempt to win back their good graces by attacking the voice that speaks most clearly against them, their drug-running, their terror.

Whitman, McElroy, and people like them belong in prison. It is they who are responsible for terror in the streets, for the drugs that are rampant in city schools. Now they've committed a crime for which they've been caught. But will they go to jail? Unfortunately, the reality is that we must deal with corrupt judges. A corrupt Maryland judge was responsible for a $30,000 libel judgement against the Labor Party, at the behest of the Zionist networks that also back Parren Mitchell, when we first exposed Whitman in 1975. A corrupt Baltimore judge was similarly responsible for hiding evidence to protect Mitchell's vote fraud apparatus and refusing Debra Hanania-Freeman access to voting machines and other election material after the 1978 election.

We must make sure that this time justice is done. Whitman and his friend committed felonious assault. Their trial is set for June 20 in Northern District Court. They should be jailed and the trail of responsibility tracked up to the top of the local Zionist drug-terror network which, among other things, controls the Parren Mitchell machine and the ACLU, and uses Johns Hopkins University as its operational center. Finally, the Zionist tradition of keeping the black population in backwardness will be cleaned up with the creation of a Maryland-Washington, D.C. Regional Anti-Drug Coalition, which Debra Hanania-Freeman will be central in organizing.

WHITMAN LIVES AT
3133 GUILFORD AVE.
235-3530

MC ELROY LIVES AT
34 EAST 25 ST.
366-5598

EISENBERG LIVES AT
2541 SAINT PAUL ST.

Pol. Ex. No. 3-for id

for further info. U. S. LABOR PARTY
366-8080

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN *

Plaintiff *

v. * 1975/387/18960

U.S. LABOR PARTY *

Defendant *

* *

SHOW CAUSE ORDER

It is ORDERED, by the Court of Common Pleas of Baltimore City, this 19th day of February, 1980, that Defendant, U.S. Labor Party, and New Solidarity International Press Service, Inc., Campaigner Publications, Inc., National Caucus of Labor Committees, Fusion Energy Foundation, Citizens for LaRouche, Committee to Elect LaRouche, Committee for Fair Elections, Labor Organizers Defense Fund, Computron Technologies, Inc., World Composition Services, and PMR Associates, show cause, if any there be, or or before the 31st day of March, 1980, why the relief prayed in Plaintiff's Petition for Special Relief for Judgment Creditor should not be granted.

PROVIDED that a copy of said Petition with its exhibits and two accompanying memoranda and a conformed or true test copy of this Order be served upon Lawrence Freeman and on the Maryland Department of Assessments & Taxation on or before the 5th day of March, 1980.

A Sklar

Judge

TRUE COPY TEST
SAUNDRA E. BANKS
CLERK

Law Offices of
John C. Armor, P.A.
Ruxton Towers, Suite 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

IN THE COURT OF COMMON PLEAS OF BALTIMORE CITY

GRENVILLE B. WHITMAN	*	
Plaintiff	*	
v.	*	1975/387/18960
U.S. LABOR PARTY	*	
Defendant	*	

* *

MEMORANDUM OF FACTS

1. As a result of two leaflets (Exhibits A and B), printed and distributed by the Defendant, U.S. Labor Party, during and just after the Baltimore City primary election in 1975, Grenville B. Whitman recovered a judgment in the Court of Common Pleas of Baltimore City in September, 1977, of $30,000 together with interest and costs against the U.S. Labor Party.

2. Defendant appealed unsuccessfully to the Maryland Court of Special Appeals and Court of Appeals, and, on June 4, 1979, the United States Supreme Court denied certiorari.

3. Despite this, and despite unrelenting attempts by the Plaintiff to collect, the judgment remains unpaid after two years. For example, while the information contained herein shows that the Defendant handles substantial funds, executions directed to the eleven primary banks in Baltimore were returned nulla bona: Case No. 1977/400/19849.

4. The U.S. Labor Party has its headquarters in New York City and branch offices and organizations in approximately 35 cities in the United States.

Its chairman, Lyndon LaRouche (154:14) (all references are to the page and line of the July 11, 1979, proceedings), was a presidential candidate in 1976 (59:13),

JCA:mks
2/14/80

and he was expected to be a presidential candidate in 1980 (59:7), this time as a Democrat.

5. On July 11, 1979, the three principal officials of the U.S. Labor Party in Maryland, who comprise its local "executive committee" (84:13), were examined under oath before Commissioner Paul Reed, Jr.

6. These persons are: Lawrence Freeman, chairman of the U.S. Labor Party in Maryland (27:3, 104:18) and a member of the U.S. Labor Party's 40-member National Committee (6:12, 144:6); Debra Freeman, unofficial financial officer for the U.S. Labor Party in Maryland (60:20, 86:18, 87:1) and a party candidate for Congress in 1978 (63.3); and Robert Primack, the third member of the local "executive committee" and a party candidate for the Baltimore City Council in 1979 (96:4, 101:19).

7. The purpose of the Supplemental Proceeding was to discover the nature and location of the U.S. Labor Party's assets.

8. All three party officials steadfastly maintained that the U.S. Labor Party has no funds or other assets. Consider three excerpts from the transcript to this effect:

1. Q (by Mr. Marcus) They don't have any money at all?

   A (by Debra Freeman) I don't think so (60:3).

2. A (by Robert Primack) The Labor Party does not have any money (85:16).

3. Q (by The Court) This judgment, by the way, could be paid, couldn't it? I mean, there is money available somewhere ---

   A (by Lawrence Freeman) Not to my knowledge (132:21).

   Q --- to pay this judgment?

   A To my knowledge, there is not (132:2).

9. In more detail, these party officials testified that the U.S. Labor Party does not pay salaries to them (54:16, 89:2, 105:1), or to anyone in Maryland (111:9), does not charge dues (77:2), does not issue formal financial reports (40:5), has not paid its attorney to defend it in this action (134:14), does not allocate funds to its Maryland operations (44:6), does not receive monies from Maryland (48:20), and does not contribute to its members' political campaigns in Maryland (73:8, 101:15) or to its national chairman's campaigns for president (60:1, 79:9).

They further testified that the U.S. Labor Party in Maryland has no bank account (39:5, 82:21, 161:3), does not pay the rent for the offices it occupies in the Medical Arts Building, Suites 301 and 302, in Baltimore (17:21, 29:2), keeps no formal financial records (47:16, 108:17), has no formal financial officer in Maryland (27:11), and wires all money which it collects to another organization, Campaigner Publications, Inc. (35.2) in New York City.

10. Even though these party officials testified that their organization is totally without funds or other assets, U.S. Labor Party activities in Maryland are varied and apparently extensive.

11. U.S. Labor Party members are involved in political education activities through the periodic publication of leaflets (149:19), sales of the party's newspaper, New Solidarity (31:10), bumper stickers (72:1), and other literature (44:15), and lectures (139:17), meetings (23:4), and nominating conventions (59:11).

12. U.S. Labor Party members have run in the following city and state elections in recent years: Mayor of Baltimore City, President of the Baltimore City Council, and Baltimore City Council (1975); Seventh Congressional District (1976); Governor of Maryland, Lieutenant Governor

of Maryland, House of Delegates, and Seventh Congressional District (1978); and Baltimore City Council (1979), a total of nine campaigns.

13. Therefore, though allegedly penniless, the U.S. Labor Party in Maryland and in New York City has full-time staff members, rents offices and telephones, and is involved in extensive political activities.

14. An examination of the transcript of the Supplementary Proceeding shows that party officials' salaries, the office rent, and other expenses are paid by a group of inter-related and cooperative organizations which are staffed and operated as a single entity.

15. In addition to the U.S. Labor Party, these organizations are New Solidarity International Press Service, Inc., Campaigner Publications, Inc., National Caucus of Labor Committees, Citizens for LaRouche (75:2), Committee to Elect LaRouche (79:10), Teamster Committee to Elect LaRouche President, LaRouche Campaign Finance Committee, Fusion Energy Foundation (76:2, 161:11, 162:2), Committee for Fair Elections (76:9), New Benjamin Franklin Publishing House, Labor Organizers Defense Fund (137:20), Computer Technologies, Inc., World Composition Services, PMR Associates, et al.

16. The New Solidarity International Press Service pays an annual stipend to both Lawrence Freeman (54:7), and Debra Freeman (54:9), in approximate amounts of $4,000 to him (105:21) and $2,500 to her (54:6). Thus, two top officials of the U.S. Labor Party in Maryland are on the payroll of the New Solidarity International Press Service.

17. The offices used by the U.S. Labor Party in Maryland (1.1:18) are leased by Campaigner Publications (17:21) and the rent is paid by checks issued by the New Solidarity International Press Service (18:20). At least 12 members of the U.S. Labor Party in Maryland have keys

to these offices (124:20).

18. For at least the past four years, the U.S. Labor Party, New Solidarity International Press Service, and the National Caucus of Labor Committees have shared office space in Baltimore (126:20), at 2539 St. Paul Street (127:17) and now in the Medical Arts Building.

19. The U.S. Labor Party, the National Caucus of Labor Committees, Campaigner Publications, and New Solidarity International Press Service all share offices at 26 Court Street, Brooklyn, New York, (155:13) and formerly shared offices at 231 West 29th Street, Manhattan (160:21).

20. As Lawrence Freeman testified, "we share office space here, and I would say they probably share office space there, also" (159:3).

21. The U.S. Labor Party was originally formed by members of the National Caucus of Labor Committees (58:17), substantially all members of the National Caucus of Labor Committees are members of the U.S. Labor Party (59:4), and the National Caucus of Labor Committees is the "core group" of the U.S. Labor Party (138:13).

22. There is a contractual relationship between the U.S. Labor Party and Campaigner Publications (44:16), described by Debra Freeman as follows:

> "Well, what happens is that once or twice a week we are sent literature from New York, what I believe is the case, and Larry [Lawrence Freeman] would have to clarify that. I believe the national U.S. Labor Party has a contractual agreement with Campaigner Publications where we provide the ideas for certain materials which they print. Labor Party members volunteer to sell that material, because they want the ideas circulated. The money for that in turn goes to Campaigner Publications, which publishes and pays for the material" (45:4).

23. These four organizations, namely the U.S. Labor Party, New Solidarity International Press Service, Campaigner Publications, and the National Caucus of Labor Committees (as well as a number of other organizations), have a close working relationship, as shown by the following exchange (155:4):

Q (by Mr. Marcus)	In fact, isn't it the case that Campaigner Publications and New Solidarity International Press Service and National Caucus of Labor Committees and U.S. Labor Party are one big organization?
A (by Mr. Freeman)	Far from it.
Q	I'm sorry?
A	Far from it.
Q	Well, they share office space?
A	Yes.
Q	And they exchange information?
A	Yes.
Q (by The Court)	They are brothers and sisters, are they not? One compliments the other?
A	There is a relationship of them working together, absolutely.

24. The newspaper, New Solidarity, which is sold by members of the U.S. Labor Party, is printed by Campaigner Publications (106:11).

25. Lawrence Freeman, chairman of the U.S. Labor Party in Maryland, stated that one of his duties is to "gather news, analyze it, and give it to New Solidarity in

New York for articles, whatever they do with it, for dissemination of ideas" (106:3).

26. Debra Freeman stated she daily wires all monies collected from sales of New Solidarity and other publications by U.S. Labor Party members to Campaigner Publications (35:2). She also stated that she is a member of the National Caucus of Labor Committees (55:16).

27. At least five persons identified as U.S. Labor Party members in Maryland (William Salisbury (31:20), Arthur Murphy (32:11), Nancy Radcliffe (32:16), Belinda DeGrazia (33:1), and William Sinclair (107:18)) currently sell copies of New Solidarity.

28. Lawrence Freeman and Debra Freeman, who receive stipends from New Solidarity International Press Service, stated they operate under "marching orders" from Costas Kalamtigis, identified as the U.S. Labor Party's "chief of staff," and from Nancy Spannaus, identified as the U.S. Labor Party's treasurer (39:18, 57:13, 154:4), both located in New York City.

29. Nancy Spannaus is treasurer of the U.S. Labor Party and is a member of the U.S. Labor Party's National Executive Committee (50:7). It was she who decided to place Debra Freeman on a New Solidarity International Press Service stipend (58:7). She is an editor of New Solidarity (157:5) and helps to run the New Solidarity International Press Service (57:11).

30. This whole organizational and financial apparatus is currently involved in a national political campaign.

31. Lyndon H. LaRouche, chairman of the U.S. Labor Party (154:14), is presently a candidate for President of the United States as a Democrat.

32. On his "Statement of a Candidate for Nomination or Election to Federal Office" submitted to the Federal Election Commission (F.E.C.) on January 24, 1979, he listed his

party affiliation as "U.S. Labor Party." (For reasons unknown to Plaintiff, LaRouche has since changed his party affiliation to "Democratic," -- according to an amended statement filed with the F.E.C. on November 9, 1979.)

33. In a Statement of Organization For a Political Committee filed with the F.E.C. on January 24, 1979, LaRouche designated "Citizens for LaRouche" (7::2) to be his principal campaign committee. Other related electoral committees registered with the F.E.C. are: "Teamster Committee to Elect LaRouche President"; "Committee to Elect Lyndon LaRouche"; and "LaRouche Campaign Finance Committee".

34. On November 27, 1979, the Citizens for LaRouche applied to the Federal Election Commission for presidential primary matching funds in the amount of $194,739.61. (Exhibit D)

35. Included in this application were reported contributions from the following U.S. Labor Party members in Maryland: Gerald Belsky ($250); Belinda DeGrazia (33:1) ($250); Lawrence Freeman (transcript) ($250); Debra Freeman, listed as "Debra Hanania" (transcript) ($250); Joseph Jennings ($230); Malcolm Pivar ($250); Arthur Murphy (32:11) ($128); Robert Primack (transcript) ($250); Nancy Radcliffe (32:10) ($250); Robert Robinson ($250); William Salisbury (31:20) ($250); Nancy Sinclair ($250); William Sinclair (107:18) ($250); Thomas Szymecko ($247); and Steven Warm ($190).

36. On October 18, 1979, the Citizens For LaRouche ("Citizens") filed its most recent quarterly financial report with the Federal Election Commission.

37. An examination of this report reveals expenditures and debts relative to [illegible] as follows:

a. Campaigner Publications, Inc. was paid $5,101.00 on account by Citizens and owed $62,501.25 for rent and phones, printing, advertising, and purchase of literature;

b. New Solidarity International Press Service paid $500.00 on account by Citizens and owed $1,207.00;

c. National Caucus of Labor Committees was owed $697.50 by Citizens;

d. Jeffrey Steinberg, who testified during the trial of this action that he is chief of security for the U.S. Labor Party, paid $4,120.00 on account by Citizens and owed $12,667.30 for "security services for candidate"; and

e. Carol White (88:10, 93:14) was paid $991.00 by Citizens for "campaign consultation services."

38. Regarding payments to the attorney who has represented the U.S. Labor Party throughout this litigation in Maryland (David B. Mitchell), the following is known:

a. The U.S. Labor Party is not paying him for his services (134:14);

b. Lawrence Freeman hired him originally and paid his retainer (137:14);

c. The National Caucus of Labor Committees paid part of Mr. Mitchell's fees (138:7), although Lawrence Freeman stated he does not know why (143:12).

d. It is possible, according to Lawrence Freeman, that Mr. Mitchell has been paid in cash one or more times (148:18), possibly by Debra Freeman (142:2) and possibly by Robert Primack (149:3).

39. Exhibit C, which was not available to Plaintiff at the time of the testimony of Defendant's Maryland officials, consists of true and correct copies of teletype messages sent by the National Executive Committee of Defendant, to all local offices, including Baltimore.

40. Attached as Exhibit D is a correct translation of all of the abbreviations and references which appear on Exhibit C.

41. As indicated on Exhibit C, middle of page 5, all local offices, including Baltimore, are required to report sales of materials by number and amount, hours worked, total contributions, and total members' loans, on a daily basis.

42. As indicated in Exhibit C, the daily information transmitted to the National Executive Committee is compiled and transmitted back in summary form to all local offices, also on a daily basis, giving the day's totals, the week to date, and the previous week, for all of the above information.

43. The items concerning "loans" means loans taken out by individual members of the party, which they signed for, and which are also signed for by some officer of the Party. As long as the member remains loyal and active to the Party, the Party will make the payments on these loans. At such time as the member leaves or defects from the Party, the Party then defaults on the loan and it is left to the member to pay it. As the print-outs indicate, the loans are a substantial portion of the money available to the Party, and the threat that the member will be saddled with the obligations is a major incentive to keep members active in and loyal to the Party.

44. As the print-outs indicate, monies which are contributions to the U.S. Labor Party, contributions to Citizens for LaRouche, income for sales of materials for the Fusion Energy Foundation, and income for sales of materials by Campaigner Publications, Inc., as well as the loans of Party members, are all lumped together in a single funding mechanism, transmitted to New York, and disbursed by the National Executive Committee, according to its decisions.

45. The print-outs, therefore, demonstrate that the testimony of the Party officials in Maryland, taken at depositions under oath, are false in several important respects:

a) Contrary to the statement of the local officials, the Party does maintain very elaborate and detailed financial records in Maryland;

b) Contrary to the statement of Party officials, the Party does have substantial financial assets, and its only basis for saying that it lacked funds to pay the judgment entered in the above case, is the actions of the National Executive Committee in transferring all of the funds raised in Baltimore, and in other local offices, to allegedly separate entities such as Campaigner Publications, Inc., Citizens for LaRouche, and Fusion Energy Foundation, as they arrive in New York.

46. Exhibit C indicates violations of the charitable organization laws of New York state, where the Fusion Energy Foundation is registered, and also of the Internal Revenue Code on charities. They also indicate serious violations of both the Federal Election Act, and the Internal Revenue Code concerning corporate donations to political organizations. And they also indicate violations of the Federal Election Act in the receipt of corporate contributions by both the U.S. Labor Party and Citizens for LaRouche.

47. Lastly, since Lawrence Freeman has stated under oath that he is the "Chairman of the U.S. Labor Party in Maryland," and since Exhibit C shows that all sales made, hours worked by members, collection and transmittal of receipts, and collection and transmittal of assets to the National Executive Committee are handled as a single combined transaction, the Exhibit also indicates that he must be acting as "managing agent" for the other organizations and activities which are inextricably intertwined with those of the Party in Maryland.

In summary, there is ample evidence to conclude that these organizations operate as an entity, and that the U.S. Labor Party is an integral part of this cohesive whole:

a. New Solidarity International Press Service pays stipends to two top U.S. Labor Party officials in Maryland;

b. The New Solidarity International Press Service pays the rent for the U.S. Labor Party's offices in the Medical Arts Building in Baltimore;

c. The U.S. Labor Party's office in Baltimore is leased in the name of Campaigner Publications;

d. There is a contractual relationship between the U.S. Labor Party and Campaigner Publications;

e. All monies collected by the U.S. Labor Party in Maryland are wired to Campaigner Publications in New York City;

f. The U.S. Labor Party, New Solidarity International Press Service, Campaigner Publications, and the National Caucus of Labor Committees share offices both in Baltimore and in New York, and "there is a relationship of them working together, absolutely";

g. Citizens For LaRouche, the principal campaign committee for the U.S. Labor Party chairman's campaign for president, receives contributions from members of the U.S. Labor Party and pays New Solidarity International Press Service, Campaigner Publications, the National Caucus of Labor

Committees, and key U.S. Labor Party officials for various electoral services, including office rent.

h. The U.S. Labor Party's newspaper, New Solidarity, is printed by Campaigner Publications;

i. The U.S. Labor Party's national treasurer is an editor of New Solidarity and helps to run the New Solidarity International Press Service; and

j. The National Caucus of Labor Committees helped to finance the U.S. Labor Party's legal defense in this present litigation.

k. By combining in the hands of Maryland officials and the Nation Executive Committee, funds allegedly belonging to profit-making corporations, and a charity, the Defendant is causing those corporations, and that charity, to make political contributions to both the Defendant, and to LaRouche, a Democratic candidate for President, contrary to laws and regulations of the I.R.S. and the F.E.C.

l. By combining funds allegedly due to political entities and profit-making corporations with those allegedly due to a charity, the Defendant is causing the charity to operate outside the laws and regulations of New York, and of the I.R.S.

m. By using the threat of default on loans from Party members, the Defendant is controlling the activities of profit-making corporations, and a charity, contrary to I.R.S. and F.E.C. laws and regulations.

In short, the U.S. Labor Party has chosen to hide its financial assets by fraudulently distributing them to one or more closely associated organizations, which, together, form a single, un-named entity, controlled by the Defendant's National Executive Committee, whose instructions are carried out in Maryland by the Defendant's local officials.

Respectfully submitted,

John C. Armor
Attorney for Plaintiff

Ruxton Towers, Suit 108
8415 Bellona Lane
Towson, Maryland 21204
(301) 821-0270

Of Counsel:

Philip L. Marcus, Esq.

2617 Guilford Avenue
Baltimore, Maryland 21218
(301) 889-3890

Exhibit A

THE POLITICS OF ADDICTION



Part I: Methadone Maintenance in Baltimore

Grenville Whitman, from his present slick three-piece-suit to his "community" rhetoric, stinks of his SS background. This paranoid FRANKENSTEIN was created by RAND Computer technology and military intelligence - probably through his own use of drugs while an Air Force Paratrooper. Whitman, who in the late 1960's was already spreading his Maoist "off the pigs" verbiage, is not only an agent, but a murderer. If your child or neighbor has OD'd or been subjected to drug induced brainwashing, Whitman is responsible. In 1968, Whitman publically organized his drug pushing with great fanfare. He directed the notorious "Man Alive" program better know as "methadone maintenance".

Methadone is synthetic heroine - only more addictive. It was developed by the Nazi branch of Rockefeller's international cartel and was originally named "Dolphine" after Adolph Hitler. It was advocated by Brigadeer General, Dr. John Rawlings Rees, (leader of the Rockefeller and Ford Foundation - sponsored fascist think-tank, the Tavistock Institute of London.) to impose a Clockwork Orange style 1984 police state with the aid of local and community health centers like "Man Alive" and the "People's Free Medical Center". Under control through methadone mind dulling addiction a man - like a dragged race horse - is more easily driven to work himself to death. The real purpose of methadone was - and still is - slave labor.

Gren Whitman is not merely running for city council in the second district. Since his days with the Berrigans Whitman has played a direct role in Baltimore's hidden government. Other key figures in this attempt at gestapo style takeover have been "ex" military intelligence police chief Pomerleau, Peking agent Richard Pfeffer and their public pigs Walter "the racist" Orlinsky, and Barbara "what, me a lesbian." Mikulski.

An investigation into Whitman's backround, which he as a public candidate is unwilling to reveal ("this is all the public has to know") will expose the hideous underbelly of Baltimore's sewer faction, involving drugs, gunrunning, bombing, rape, etc. Call the Labor Party with this information and press charges.

F L A S H ! ! ! F L A S H ! ! ! F L A S H ! ! !

Because of this leaflet Grenville Whitman is sueing U.S. Labor Party candidates for $400,000 each. This means we have got this creep on the run. Drive this paranoid dope pusher out of the city!

GRENVILLE WHITMAN:
Home: 3133 Guilford Ave. 235-3530
Campaign Headquarters: 416 E. 31st St. 366-2304

U.S. LABOR PARTY TICKET

*** BILL SALISBURY for MAYOR *** CAROL HARTMAN for CITY COUNCIL PRESIDENT
*** ASCHER for CITY COUNCIL, 4th DISTRICT

U.S. LABOR PARTY—824 N. CALVERT 727-

ORLINSKY CASTRATES & KILLS

SHUT DOWN MAN ALIVE METHADONE CENTER



ORLINSEY:
[illegible]-1981

MAN ALIVE:
[illegible]-4292

Walter "THE SHIT PUSHER" Orlinsky--YOUR City Council president--is a DRUG DEALER. Like other DOPE FIENDS, he must be brought to trial for MURDER, BRAIN-WASHING, and in his case flagrant misuse of city monies. He is a full supporter of "legal" DOPE methadone; and its chief protagonist Grenville "The Racist" Whitman, ex-head of the notorious methadone brainwashing center MAN ALIVE.

It is well known that Baltimore's METHADONE centers are a main conduit of illegal dope--heroin, cocaine, marijuana, etc.--as well as of the "legal" killer methadone. Methadone itself was invented by NAZI scientists in Germany who named it ADOLPHINE after Hitler, and who used it to anesthetize concentration camp victims so they could painlessly work themselves to death WITHOUT FOOD. Even then it was medically shown to lead to sterilization. After World War II the criminally insane Rockefeller brothers brought methadone to America for the SAME purpose--to create a workforce of slave labor zombies that would passively accept industrial speed-up and deteriorated social conditions.

In Philadelphia, Detroit and San Francisco, and particularly in Chicago where Mayor Daley and his trade union based machine have been blasting the city, drug traffic, committees to stop methadone are being formed. If we shut down the drug centers, we shut down Rockefeller.

WHO IS ORLINSEY?

Orlinsky, like Whitman, or Barbara "the lesbian" Mikulski, is a public [illegible] PIG, a programmed creation of Baltimore's hidden government run out of Johns Hopkins University. Because these creatures have NO human identity they are totally PARANOID. Their sexual activities are merely a projection of that paranoia. Orlinsky is a picture of [illegible] he has covered it up with FAT. These flunkies are easy tools for the Hopkins Nazi doctors, Dr. Torrey Brown and Dr. Leon Wurmser--advocates of methadone addiction.

TEN DAY DETOX FOR ALL ADDICTS

[illegible] up the Hitler Government's plans and STOP CRIME, murder, and [illegible], [illegible] methadone programs and centers. City hospitals [illegible] pay for all hospitalization [illegible]

[illegible]

U.S. Labor Party

US LABOR [illegible]

EXHIBIT C-2

ALL	773	562	1203	1164
NEW SOLIDARITY	141	207	457	489
CAMPAIGNER	40	0	70	40
EIR	220	0	220	120
FUSION	202	249	386	375
IJFE	70	105	70	140
EIR SINGLE	142	148	258	307
UNIVERSITY EDITIONS	47	17	82	40
WORKER CONTRIBUTIONS	211	135	555	468
OTHER CONTRIBUTIONS	792	1859	1495	2865
LOANS	5290	8250	5790	8350
INCOME WITH LOANS	10296	13895	16641	20598
INCOME WITHOUT LOANS	5006	5465	10851	12248

CAMPAIGNER BREAKDOWN

	FUSION	BONN	CONF	ELITES	ENERGY POTENT
DAILY	512	370	96	95	3
WEEK TO DATE	1037	952	281	285	

END OF MORNING BRIEFING FOR WEDNESDAY, JUNE 28, 1978

POSTMASTER GENERAL WILLIAM F. BOLGER OF U.S. LABOR PARTY CHARGES OF SYSTEMATIC MAIL THEFT AND FINANCIAL WARFARE CONDUCTED THROUGH THE U.S. POST OFFICE.

IN A LETTER TO BOLGER, CONGRESSMAN HANLEY NOTES, "I THINK THE POSTAL SERVICE SHOULD VERY CAREFULLY INVESTIGATE THIS MATTER TO DETERMINE WHETHER SOME SYSTEMATIC INTERRUPTION OF MAIL SERVICES TO THIS ORGANIZATION HAS OCCURRED. IF THE FACTUAL INFORMATION IS ACCURATE, IT IS HIGHLY UNLIKELY THAT THE NORMAL ERROR RATE AND LOSS RATE COULD ACCOUNT FOR SUCH SIGNIFICANT LOSSES AND DELAY OF MAIL....THIS MATERIAL DOES NOT INVOLVE A LOST LETTER; IT INVOLVES A PATTERN OF LOSSES WHICH SUGGESTS THE NEED FOR A MUCH MORE SUBSTANTIAL INVESTIGATION." SOURCES IN THE HOUSE COMMITTEE HAVE INDICATED THAT IF THE POSTMASTER'S RESPONSE IS NOT SATISFACTORY THEY ARE FULLY PREPARED TO LAUNCH FURTHER INVESTIGATIONS.

INCOME PARAMETERS FOR TUES. FEB. 20, 1979

RGN	ATL	BAL	BSN	BUF	CGO	DST	NJNY	PHA	SFO	SEA	NCR	TTL
INC	179	428	309	1434	1859	3131	1820	1439	1579	581	457	13216
SNS	-	284	413	612	803	1714	1979	60	68	314	-	6252
SCMP	77	114	49	253	193	311	202	122	261	113	-	1715
WTD	25	365	625	447	4085	4845	1327	1127	160	614	250	13544

(WEEK-TO-DATE FOR MEDIA FUND ONLY)

VITAL STATISTICS:

ITEM	TUE	LTUE	WTD	LWTD
SNS	6252	4330	15763	15654
#ORG	164	173	516	573
MNHRS	590	NA	2145	2527
#NS	1308	1110	3595	3532
SCMP	1715	1714	5014	5890
SUB-TTL	1831	1424	4861	4181
NS	387	268	1197	1040
CMP	29	-	157	40
EIR	410	505	1070	810

(SUBS)	TUE	LTUE	WTD	LWTD
FUSION	720	581	1907	2046
IJFE	285	70	530	245
EIR SCL	604	208	1278	930
UNIV ED	299	241	1107	1082
WKR CTRB	851	4598	2121	6267
OTHR "	514	144	8867	1312
LOANS	4370	1500	4870	2900
INC TTL	13216	10946	33795	27372
W/O LNS	8846	9446	28925	24972

CAMPAIGNER BREAKDOWN:	DAILY	WEEK-TO-DATE	TOTAL-TO-DATE
FUSION #5	447	1,260	5,853
LAROUCHE	185	506	9,764
CHRISTIAN	102	322	2,446
CIVIL WAR	34	87	1,725
DOPE, INC.	24	117	10,892

END MORNING BRIEFING THURS. FEB. 22, 1979.

C 3

INCOME PARAMETERS FOR MONDAY, FEB. 26, 1979

VITAL STATISTICS:	MON	LYMN	MTD	LYTD	BY REGION: REG	INC	ANS	SCPR	CFL
NEW SENIORITY	3848	3763	12030	9511	ATL	112	0	31	0
ORGNZRS	143	147	401	1555	BAL	467	236	154	45
MAN HOURS	594	507	1801	N.A.	BSN	202	162	20	32
NSSL ($)	953	892	2749	2237	BUF	830	431	186	0
CMPR ($)	1339	1361	3209	3299	CGO	-1353	737	165	25
ALL SUBS	1572	1205	4190	3030	DET	-1009	-1011	290	100
I.S.	286	310	853	310	NYNJ	991	593	256	110
CMPR	38	36	77	123	PHA	503	20	71	175
FIR	515	270	1630	660	SFO	522	52	75	41
FUSION	533	447	1395	1137	SPA	285	262	94	25
IJPS	200	140	235	245	WDR	174	0	27	0
FIR SINGLE	467	253	1049	674	TTL	-5517	-3143	-1339	553
UNIV FD	114	254	609	308	------CAMPAIGNERS----------				
MRKT CER	731	775	2022	1270	CMPR	DLY	MTD	TTD	
OTHR CER	301	40	1285	2258	FUSN	129	452	9327	
LOANS	500	500	925	500	FIRN	127	N.A.	N.A.	
INC TOTAL	5517	9233	17494	20579	CRSTN	42	110	2827	
INC - LOANS	5117	8733	16574	20079	LAROT	14	134	-1015	
NO OF WORDS IN BRIEFS FOR NEWS					DOPE	7	53	-1101	
CV. FEB. 23, 1979					CV MR	13	56	1854	

* IN THE SEATTLE AREA, THE ZIONIST-CONTROLLED GEORGE JACKSON BRIGADE RECENTLY SET OFF A BOMB AS DIVERSION FOR A BANK ROBBERY. ALSO, THE BRIGADE'S ABOVE-GROUND APPARATUS, THE REVOLUTIONARY UNION AND THE REVOLUTIONARY COMMUNIST PARTY (RCP), STAGED A PARAMILITARY DEMONSTRATION IN DOWNTOWN SEATTLE DEFENDING THE "RIGHT TO REBEL." IN BRITISH COLUMBIA, THE REGION'S ANTI-DOPE LAW ENFORCEMENT BODY, CLEU, WAS FIRED UPON DURING ONE NIGHT LAST WEEK, AND SEVERAL BRITISH COLUMBIAN BANKS HAVE BEEN THE TARGETS OF "ANARCHIST" ROBBERIES.

* IN WESTCHESTER, N.Y., THE LONG-DORMANT JONATHAN JACKSON-SAM MELVILLE BRIGADE BOMBED THE MOBIL OIL BUILDING ON FEB. 27, TAKING UP THE CAUSE OF THE NEW YORK CITY-BASED FALN.

* IN BALTIMORE, THE REVBOLUTIONARY COMMUNIST PARTY AND YOUTH AGAINST WAR AND FASCISM WERE GIVEN HIGH PROFILE DURING THE FEB. 19 AND 20 "SNOW RIOTING," ENCOURAGING PEOPLE TO JOIN THE LOOTING.

* A SACRAMENTO, CALIFORNIA COURT DECISION OF FEB. 27 FREED SYMBIONESE LIBERATION ARMY TERRORIST RUSSELL LITTLE, USING A TECHNICALITY TO FIND LITTLE NOT GUILTY OF THE 1973 MURDER OF OAKLAND SCHOOL SUPERINTENDENT MARCUS FOSTER.

INCOME PARAMETERS FOR TUESDAY, FEB. 27, 1979

VITAL STATISTICS:	TUE	LTUE	WTD	LWTD
NEW SLDRTY	4542	6252	16572	15763
ORGNZRS	180	164	581	516
MAN HOURS	790	590	2591	2145
INSGL ($)	1064	1308	3813	3595
CMPR ($)	1905	4715	5114	5014
ALL SUBS	2709	1331	6899	4861
N.S.	363	387	1216	1197
CMPR	27	29	154	157
EIR	1340	410	2970	1070
FUSION	860	720	2255	1907
IJFE	69	285	304	530
EIR SINGLE	641	604	1690	1278
UNIV ED	679	299	1288	1107
WRKR CTR	758	351	2780	2121
OTHR CTR	545	514	2533	8867
LOANS	1125	4370	2050	4870
INC TOTAL	12070	13216	29564	33795
INC - LOANS	10945	8846	27519	28925

END OF BRIEF FOR MARCH 1, 1979

BY REGION:

REG	INC	#NS	$CPR	$CFL
ATL	226	4	100	50
BAL	396	335	111	25
BSN	575	578	84	0
BUF	875	469	230	0
CGO	2946	713	391	1050
DET	841	1471	302	100
NYNJ	2137	498	94	795
PHA	445	158	130	0
SFO	1223	88	294	135
SEA	770	228	141	30
NCR	1636	0	28	0
TTL	12070	4542	1905	2235

CAMPAIGNERS

	DLY	WTD	TTL
CMPR			
FUS#5	609	1561	8936
CRSTN	35	195	2912
DOPE	37	140	11097
CV WR	17	73	1876
LAROU	93	227	10243

VITAL STATS:	MON.	LAST M.	W.T.D.	L.W.T.D.
# NS	3,558	4,660	10,682	12,670
ORGANIZERS	151	142	366	378
MANHOURS	635	647	1,764	1,822
$ NS	851	1,200	2,469	3,120
$ CMPR	1,580	1,590	4,569	4,611
SUBS (ALL)	3,401	2,031	7,579	5,526
NS	482	303	908	632
CMPR	43	20	43	99
EIR	1,125	396	2,280	3,500
FUSION	1,576	1,138	3,893	3,500
IJFE	175	174	455	279
EIR SINGLE	451	522	1,003	1,085
UNIV EDITIONS	688	823	1,732	1,975
WORKER CONTRIBS	776	206	2,020	1,985
OTHER CONTRIBS	906	1,035	2,493	4,130
LOANS	-	150	400	150
INCOME TOTAL	8,740	8,269	22,163	24,001
MINUS LOANS	8,740	8,119	21,763	23,851

CAMPAIGNER BREAKDOWN:	DAILY	WEEK-TO-DATE	TOTAL-TO-DATE
FUSION # 6	362	1,110	10,218
SCHLESINGER	597	1,983	4,255
ZIONISM	70	138	11,968
DOPE, INC.	130	299	15,335

(NOTE* REGIONS ARE REMINDED THAT IT IS NEC POLICY TO HAVE A COMPLETE FINANCIAL REPORT EVERY DAY, WITHOUT EXCEPTIONS.)

INTERNAL MEMORANDUM

NEW EVIDENCE ON PALSEN-NAG OPERATIONS

THE SECURITY-COUNTERINTELLIGENCE STAFF AND THE NEC ARE PRESENTLY IN POSSESSION OF A SIZEABLE AMOUNT OF WRITTEN EVIDENCE THAT CHUCK PALSEN WAS DEPLOYED INITIALLY INTO THE LABOR COMMITTEES AS AN AGENT OF THE CIRCLES ASSOCIATED WITH MARGARET MEADE, THE ASPEN INSTITUTE AND THE MK-ULTRA PROJECT.

WE SUMMARIZE THE WRITTEN EVIDENCE HERE AND THEN INDICATE THE PRESENT PROFILE OF OPERATIONS OF THE PALSEN-LERNER-TORRES NETWORK.

PALSEN, BY HIS OWN ADMISSION, WAS TRAINED AT THE UNIVERSITY OF CHICAGO GRADUATE SCHOOL OF ANTHROPOLOGY "TO PROFILE PEOPLE'S WEAKNESSES" - AND THAT WAS HIS PRINCIPLE ASSIGNMENT DURING HIS PERIOD IN THE LC. SPECIFICALLY, HE WAS PART OF A SMALL CIRCLE OF UC ANTHROPOLOGY GRADUATE STUDENTS WHO WERE DEPLOYED ON LONGTERM FIELD ASSIGNMENTS TO CREATE A VARIETY OF TERRORIST CAPABILITIES INCLUDING THE AMERICAN INDIAN MOVEMENT, THE REVOLUTIONARY UNION AND A NUMBER OF PUERTO RICAN TERRORIST CELLS OPERATING IN BOTH PUERTO RICO AND THE CONTINENTAL UNITED STATES. JOSE TORRES' WIFE, JUDY STERN TORRES, WAS NOT ONLY A CLOSE ASSOCIATE OF PALSEN DURING THIS PERIOD: SHE

RECRUITED JOSE IN PUERTO RICO AS HER "TERRORIST INFORMANT" AND RELIED ON PALSEN FOLLOWING THEIR RETURN TO THE U.S. TO MAINTAIN JOINT CONTROL OVER JOSE - LARGELY THROUGH SEXUAL MANIPULATION AND BLACK-MAIL. BACK IN THE U.S., PALSEN BECAME ADDITIONALLY INVOLVED IN SEXUAL PROFILING STUDIES AND IN SPINOFF WORK OF THE ORIGINAL MK-ULTRA EFFORTS. HE WAS IN PERSONAL CONTACT WITH MARGARET MEAD DURING THE PERIOD LEADING UP TO HIS "JOINING" THE LABOR COMMITTEES (AT WHICH TIME JOSE AND JUDY TORRES WERE LIVING WITH PALSEN AND HIS WIFE IN A COMMUNE).

LONG AFTER INFILTRATION INTO THE LC. PALSEN RETAINED HIS CONTACTS WITH THESE TAVISTOCK-ANTHROPOLOGY NETWORKS. THESE CONTACTS INCLUDED ASSOCIATION WITH ANGIER BIDDLE-DUKE, A TOP EPISCOPAGAN OPERATIVE DEEPLY INVOLVED IN MK-ULTRA AND IN THE ASSASSINATION OF SAUDI KING FAISAL. IT IS LIKELY THAT THE ASSOCIATIONS WITH THE BIDDLE-DUKE NETWORK EXTENDED TO THE EARLY 1960S WHEN PALSEN WAS ON UNIV. OF CHICAGO FIELD WORK IN PORTUGAL AT THE SAME TIME THAT BIDDLE-DUKE WAS THE U.S. AMBASSADOR TO SPAIN AND EFFECTIVELY RUNNING ALL OPERATIONS ON THE IBERIAN PENINSULA. AT THE SAME EARLY 1960S PERIOD, BIDDLE-DUKE WAS ALSO A PRINCIPLE CONTACT POINT FOR ISRAELI INTELLIGENCE "HIT TEAMS" LED BY ZWY ALDOUBY.

AT THE PRESENT TIME, PALSEN IS FUNCTIONING AS A BRIDGE TETWEEN TWO RUNGS OF THE NAG NETWORKS DEPLOYED AS THE GUTTER LEVEL OF ANGLO-AMERICAN CONTAINMENT DEPLOYMENTS AGAINST THE ORGANIZATION AND ITS SUPPORTERS. ON THE ONE SIDE, PALSEN IS WORKING IN ACTIVE COLLUSION WITH THE LERNERS, BOB BERKOWITZ (WHO IS PRESENTLY WORKING AT RUTGERS UNIVERSITY UNDER THE WINGS OF MARXIST PERSPECTIVES EDITOR WARREN SUSMAN), MIKE GREEN AND OTHERS IN A "STUDY GROUP"-RECRUITMENT PROJECT MODELED ON TAVISTOCKIAN SENSITIVITY METHODS INTERSPRECED WITH MARXIST PERSPECTIVES RUSSELLITE RUBBISH. AT THE SAME TIME, PALSEN IS RETAINING AN HISTORICAL PARTIAL CONTROLLER RELATIONSHIP TO JOSE TORRES - WHO IS BEING DEPLOYED IN A MORE "ACTION" (I.E., TERRORIST) DIRECTION THROUGH CIRCLES OPERATING OUT OF NEW YORK UNIVERSITY.

IT IS TO BE EMPHASIZED THAT THIS IS A SERIOUS TERRORIST CAPABILITY NOW BEING SET IN PLACE BY THE VERY NETWORKS PRESENTLY UNDER ATTACK BY EUROPEAN SECURITY FORCES FOR THE ASSASSINATION OF ALDO MORO. IN FACT, NEW INFORMATION HAS SURFACED IN THE PAST 24 HOURS ESTABLISHING DIRECT CONTACT BETWEEN THE PALSEN-LERNER GROUP AND THE ITALIAN TERRORISTS NOW BEHIND BARS, INCLUDING ANTONIO NEGRI.

- 30 -

EXHIBIT D

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Acknowledgement of Receipt For a
Submission or Resubmission of a Request for
Presidential Primary Matching Funds

Date Received: November 27, 1979

Committee: Citizens for LaRouche

Committee Representative: from Felice Gelman and Lewis Cohen

Submission No.: T Resubmission No.: _____

No. Contributors: 2605

Received By: _____ mail Amount Requested: 194,02[illegible]

X hand Date To Be Certified: X

_____

(_____ days from receipt

Assigned Lead Auditor: Bruce K. Shelton

Absent any communication to the contrary, this submission was determined to be in conformance with the Commission's Guideline for Presentation in Good Order.

Bruce K. Shelton

Recipient for the
Federal Election Commission

Candidate agreement may have to be amended to include the name, mailing address of the person designated to receive matching funds and the depository to be used.

Felice Gelman
Citizens for LaRouche

7 7 2 2

EXHIBIT E

A
ALL SUBS=dollar total, subscriptions
ATL=Atlanta

B
BAL=Baltimore
BSN=Boston
BUF=Buffalo

C
CFL=$CFL=total dollars to Citizens for LaRouche[3]
CGO=Chicago
CMPR=CPM=Campaigner subscriptions
CRTN=CHRISTIAN=Campaigner tract on the true Christians
CV WR=CIVIL WAR=Campaigner tract, revising Civil War history

D
DET=Detroit
DLY=daily
DOPE=DOPE, INC=Campaigner tract on drugs in U.S.

E
EIR=Executive Intelligence Report subscriptions
EIR SGL=single report sales of EIR

F
FREEMAN=Campaigner tract on Debra Freeman
FUSION=Magazine of Fusion Energy Foundation[1]
FUSION #5, #6=Campaigner tracts on fusion energy

G,H I,J
IJFE=International Journal of Fusion Energy, also an F.E.F. magazine[1]
INC=income from all sources, by region

K,L
LAROU=LAROUCHE=Campaigner tract on Lyndon LaRouche
LOANS=loans from workers and members[2]
LMON=last Monday
LTUE=last Tuesday
LWTD=last week to date

M
MB=Morning Briefing
MON=Monday
MNHRS=MAN HOURS=total hours of paid organizers and volunteers, deleting zeros

N
NCR=National Capitol region
NEC=National Executive Committee
NEW SLDRTY=New Solidarity
NJNY=New York-New Jersey region
N.S.=New Solidarity subscriptions
#NS=individual sales of New Solidarity, by region
NSSL($)=dollars from slaes of New Solidarity

O,P
ORGNZRS=number of paid organizers, counted daily
OTHR CTR=contributions other than from workers
PHA=Philadelphia

Q,R
REG=region

S
SEA=Seattle
SFO=San Francisco
SCHLESINGER=Campaigner tract on James Schlesinger
SUB TTL=total subscription inco

T
TUE=Tuesday
TTD=total to date
TTL=total

U,V
UNIV ED=UNIVERSITY EDITIONS

W
W/O=without
WRKR CTR=worker contributions
WTD=week to date

X,Y Z
ZIONISM=Campaigner tract on difference between Judaism and Zionism

1. Although the Fusion Energy Fund established under New York and IRS law as a charity, its magazine sales and income are handl through the US Labor Party.

2. Loans are a major part of Party income. As noted in the Memo of Facts, Party officials co-sign the loans, with the threat of default as a control on members. T threat is credible since Party assets are hidden under other na and organizations.

3. The records, including the depos tion, show that LaRouche, nomina ly a Democratic candidate for Pr ident, receives contributions fr the US Labor Party, several prof making corporations, and one cha ity, in liolation of various IRS and FEC laws and regulations.

G.B. WHITMAN
3133 GUILFORD AVE
BALTO. MD. 21218

USPO BALTIMORE, MD M.O.W.S. 1980 FEB 27
USPO BALTIMORE, MD M.O.W.S. 1980 FEB

FIRST CLASS

KENNETH GROSS, ESQ
ASST. GENL. COUNSEL FOR
PUBLIC FINANCING
FEDERAL ELECTION COMMISSION
WASHINGTON D.C.

20463

FIRST CLASS

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Re: MUR 1158

Dear Ms. Freeman:

This letter is to advise you that the Federal Election Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). A report on the Commission's finding is attached for your information.

The Commission has therefore authorized an investigation of these possible violations. You are of course encouraged to submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the event that the General Counsel decides to make a recommendation to the Commission on whether or not there is probable cause to believe that you have violated the law, you will have the opportunity to review the General Counsel's brief and will have fifteen (15) days to submit your own brief before the Commission votes on probable cause.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha G. Gentner or Kevin H. Smith, the attorneys assigned to this matter, at 202/523-4057 and 202/523-4529 respectively.

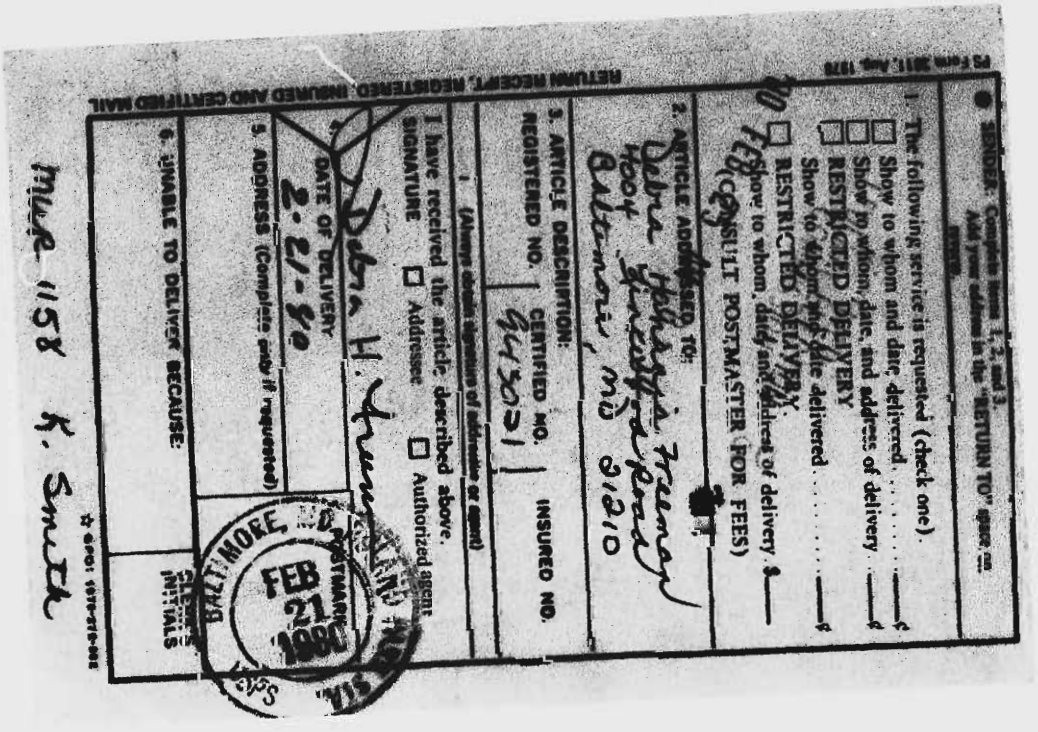
Sincerely,

Robert O. Tiernan

ROBERT O. TIERNAN
Chairman

Enclosures

Notification of Reason to Believe Finding
Description of Preliminary Procedures



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1158
STAFF MEMBER(S) & TEL. NO.
Kevin H. Smith
Marsha G. Gentner
(202) 523-4529
(202) 523-4057

RESPONDENT: Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

FACTUAL BACKGROUND

Documentation submitted to the Commission as part of matching fund submissions of the Citizens for LaRouche included numerous documents purportedly bearing the signatures of persons other than respondent which signatures were very similar in appearance to writing known to be that of respondent. Specifically, signatures attributed to David Sanders, Nancy Radcliff, Kevin Salisbury, Anne R. Taylor, Charles Clark, and Ernest K. Pulsifer appeared similar in appearance to the handwriting and signatures of respondent.

Further, a document submitted to evidence a contribution by Harold H. Harrison, M.D., contained typed information which appeared to have been made by two different typewriters at two different times, the latter typing having the effect of changing the meaning of the earlier typing to indiate that an instrument was purchased by Dr. Harrison and not by respondent.

LEGAL ANALYSIS

The Commission found that there was reason to believe that respondent may have signed the names of the purported contributors mentioned above and caused those documents to be submitted to the Commission. The Commission therefore concluded that there is reason to believe that respondent may have knowingly and willfully furnished false statements or evidence in violation of 26 U.S.C. § 9042(c)(1)(A).

The Commission also found that there was reason to believe that respondent may have altered the face of a document submitted to the Commission to indicate that an instrument actually purchased by respondent had been instead purchased by someone else and had thus furnished false statements or evidence in violation of 26 U.S.C. § 9042(c)(1)(A). The Commission also found reason to believe that respondent may have also violated 2 U.S.C. § 441f, prohibiting the making of contributions in the name of another, by the acts set forth in this paragraph.

Based on the foregoing analysis, the Federal Election Commission had found reason to believe that respondent has violated 2 U.S.C. § 441f and has knowingly and willfully furnished false statements in violation of 26 U.S.C. § 9042 (c)(1)(A).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Debra J. Hanania, a.k.a.) MUR 1158
Debra Hanania Freeman,)
a.k.a. Debra Hanania)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 12, 1980, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1158:

1. Find reason to believe that Debra Hanania Freeman, aka Dr. Debra J. Hanania aka Debra Hanania, may have violated 2 U.S.C. §441f and 26 U.S.C. §9042(c)(1)(A) by falsifying contributor information and documentation submitted to the Commission for matching funds under 26 U.S.C. Chapter 96 and by contributing $250.00 in the name of Dr. Harold Harrison.

2. Approve and send the letter attached to the General Counsel's First Report in this matter.

Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan voted affirmatively for these actions. Commissioner Aikens was not present at the time of the vote.

Attest:

2/15/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

February 11, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1158

Please have the attached First GC Report circulated for the Executive Session of February 12, 1980

Thank you.

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON,D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

This letter is to advise you that the Federal Election Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). A report on the Commission's finding is attached for your information.

The Commission has therefore authorized an investigation of these possible violations. You are of course encouraged to submit any factual or legal materials which you believe

In the event that the General Counsel decides to make a recommendation to the Commission on whether or not there is probable cause to believe that you have violated the law, you will have the opportunity to review the General Counsel's brief and will have fifteen (15) days to submit your own brief before the Commission votes on probable cause.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

In your intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha G. Gentner or Kevin H. Smith, the attorneys assigned to this matter, at 202/523-4057 and 202/523-4529 respectively.

Sincerely,

Enclosures

Notification of Reason to Believe Finding
Description of Preliminary Procedures

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON,D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

This letter is to advise you that the Federal Election Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). A report on the Commission's finding is attached for your information.

The Commission has therefore authorized an investigation of these possible violations. You are of course encouraged to submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the event that the General Counsel decides to make a recommendation to the Commission on whether or not there is probable cause to believe that you have violated the law, you will have the opportunity to review the General Counsel's brief and will have fifteen (15) days to submit your own brief before the Commission votes on probable cause.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

In your intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha G. Gentner or Kevin H. Smith, the attorneys assigned to this matter, at 202/523-4057 and 202/523-4529 respectively.

Sincerely,

Enclosures

Notification of Reason to Believe Finding
Description of Preliminary Procedures

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON,D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

This letter is to advise you that the Federal Election Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). A report on the Commission's finding is attached for your information.

The Commission has therefore authorized an investigation of these possible violations. You are of course encouraged to submit any factual or legal materials which you believe relevant to the Commission's analysis of this matter.

In the event that the General Counsel decides to make a recommendation to the Commission on whether or not there is probable cause to believe that you have violated the law, you will have the opportunity to review the General Counsel's brief and will have fifteen (15) days to submit your own brief before the Commission votes on probable cause.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

In your intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha G. Gentner or Kevin H. Smith, the attorneys assigned to this matter, at 202/523-4057 and 202/523-4529 respectively.

Sincerely,

Enclosures

Notification of Reason to Believe Finding
Description of Preliminary Procedures

[redacted]

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON,D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debra Hanania Freeman
4004 Linkwood Road
Baltimore, MD 21210

Dear Ms. Freeman:

This letter is to advise you that the Federal Election Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has found reason to believe that you may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A). A report on the Commission's finding is attached for your information.

The Commission has therefore authorized an investigation of these possible violations. You are of course encouraged to submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the event that the General Counsel decides to make a recommendation to the Commission on whether or not there is probable cause to believe that you have violated the law, you will have the opportunity to review the General Counsel's brief and will have fifteen (15) days to submit your own brief before the Commission votes on probable cause.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

In your intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha G. Gentner or Kevin H. Smith, the attorneys assigned to this matter, at 202/523-4057 and 202/523-4529 respectively.

Sincerely,

Enclosures

Notification of Reason to Believe Finding
Description of Preliminary Procedures

Evidence Attached:

1. Document filed with the Commission purporting to be a copy of the back of a check #175 drawn by HFC on Continental Bank made payable to David Sanders; the back of the check bears an endorsement of the check reading "Pay to the order of Citizens for LaRouche David C. Sanders" and bears a stamped notation reading "Citizens For LaRouche Citibank [redacted]".

2. Document filed with the Commission, dated January 22, 1980, and purportedly containing the signature of David C. Sanders.

3. Document filed with the Commission, dated December 28, 1979, and purportedly containing the signature of David Sanders.

4. Document filed with the Commission purporting to be a copy of American Express Money Order #55-467,316,467, dated 1/3/79, and purportedly containing the signature of David Sanders at the bottom under the notation "Sanders' Name and Address".

5. Document filed with the Commission purporting to include a copy of Travelers Express Money Order #189 2926722, dated Sept. 12, 1979, and purportedly containing the signature of Nancy Radcliff.

6. Document filed with the Commission including 6A and 6B:

6A. Document purporting to be a copy of a personal check numbered 234 drawn on account number [redacted] at The Equitable Trust Company, dated December 3, 1979, and purportedly containing the signature of Nancy Radcliffe.

6B. Document purporting to be a copy of a personal check numbered 235 drawn on the same account as Document 6A and purportedly containing the signature of Nancy B. Radcliffe.

7. Document filed with the Commission purporting to be a copy of Travelers Express Money Order #189 2957627, dated January 12, 1980, and purportedly containing the signature of Kevin Salisbury.

8. Document filed with the Commission containing at the bottom a statement, dated January 21, 1980, and purportedly containing the signature of Kevin C. Salisbury.

9. Document filed with the Commission including 9A, 9B, and 9C:

9A. [Not relevant for present purposes].

9B. Document purporting to be a copy of a personal check numbered 1077 drawn on account number [redacted] at the Maryland National Bank, dated 6 August 1979 and listing the payee as "Citizens for LaRouche".

9C. Document purporting to be a copy of a personal check numbered 999 drawn on account number [redacted] at the Maryland National Bank, dated 4 Nov. 1979, and listing the payee as "Citizens for LaRouche".

10. Document filed with the Commission purporting to be a copy of a personal check numbered 1160 drawn on account number [redacted] at the Maryland National Bank, dated Nov. 24, 1979 [partially obliterated], and listing the payee as "Citizens for LaRouche".

11. Document filed with the Commission purporting to include a copy of a personal check numbered 1166 drawn on the same account as Document 10, and listing the payee as "Citizens for LaRouche".

12. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,411, dated 11/20/79, and listing the payee as "Citizens for LaRouche".

13. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,402, dated Nov. 13, 1979, and listing the payee as "Citizens for LaRouche".

14. Document filed with the Commission purporting to include a copy of American Express Money Order #55-466,938,424, dated 12/4/79, and listing the payee as "Citizens for LaRouche".

Requests:

1. In the opinion of the Bureau, were the signatures of David C. Sanders on Documents 1 and 2 and the signatures of David Sanders on Document 3 and on the bottom of Document 4 all made by the same individual and, if not, how many different individuals are responsible for the four signatures?

2. In the opinion of the Bureau, were the signatures of Nancy Radcliff, Nancy Radcliffe, and Nancy B. Radcliffe, on Documents 5, 6A, and 6B, respectively, made by the same individual and, if not, how many different individuals are responsible for the three signatures?

3. In the opinion of the Bureau, were the signatures of Kevin Salisbury and Kevin C. Salisbury, on Documents 7 and 8, respectively, made by the same individual?

4. In the opinion of the Bureau, were the notations "Citizens for LaRouche" on Documents 4, 5, 7, 9B, 9C, 10, 11, 12, 13, and 14, all made by the same individual and, if not, were any of them made by the same individual as any others and, if so, which ones?

Pursuant to discussions between James Lile of your section and Hal Ponder and Kevin Smith of this office, we are requesting that this matter be handled on an expedited basis. We recognize that in relying on photostats rather than originals you may not be able to make a definite conclusion. However, the opinions requested need not be absolutely definitive, since the matter will be pursued by taking signature samples in the manner you described to Hal Ponder and by obtaining the originals of the documents enclosed if your preliminary analysis indicates that such investigation might be fruitful.

Should you have any questions, please call Kevin H. Smith (523-4529), the attorney assigned to this matter.

Thank you.

DOCUMENT
1

Date 1/23/80 Code 1-3

Date 1/23/80 Code 1-3

Thanks for the info on Citizens for LaRouche

Dick Ahlen

CITIZENS FOR LaROUCHE
CITIBANK

DOCUMENT

2

MD

487

January 22, 1980
(date)

I contributed $ 1,029.58 to Citizens for Larouche on

January 22, 1980.
(date)

signed

Frank Saunders

David C. Sanders
(signature)

613 St Mary's Ave

613 St. Mary's Ave.
(address)

Baltimore Md.

Baltimore, Md.
(City) (state)

Lenore Sanders (spouse)

David Sanders

613 St. Mary's Ave.
Baltimore Md.

C

DOCUMENT #3

3-02

MD

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

DOCUMENT
4

DATE 1/4/80 DEPOSIT CODE 1-1

AMERICAN EXPRESS MONEY ORDER

23-1
1020

55-467,316,467

Balt.

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 1984 SUM 25 DOLLARS 00 CTS

TO THE ORDER OF Citizens For LaRouche

CHAIRMAN

David Sanders 613 St. Ann St. Balt. Md. 21218
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders.

⑈1020⑈000⑆55 ⑈467316467⑆


DOCUMENT
5

Travelers Express Money Order 189 2926722

SEP 14 1979

TRAVELERS EXPRESS COMPANY, INC.

PAY TO THE ORDER OF Citizens for LaRouche

DATE Sept 12, 1979

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

AMOUNT 3809 $250.00

SUBJECT TO CONTRACT PRESENTED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARIBAULT

PURCHASER, SIGN IN INK

3215 N Charles - Balto 21218

PURCHASER'S ADDRESS

⑆091900533⑆189 2926722⑈ 90

BENJAMIN F. RANEY
VIVIEN I. RANEY
1324 S. CHARLES ST.
BALTIMORE, MD. 21230

MAR 08 1979

258
226

Pay to the Order of Citizens for LaRouche $25.00

Twenty-five and 00/100 Dollars

PROVIDENT SAVINGS BANK
BALTIMORE, MD. 21201

For

Benjamin F. Raney

3-3 19 79 7-7301 2520 30

BENJAMIN F. RANEY
VIVIEN I. RANEY
1324 S. CHARLES ST.
BALTIMORE, MD. 21230

MAR 9 1979

359

1-31 19 79 7-7301 2520 30

Pay to the Order of C. L. L. $10.00

Dent and 00/100 Dollars

PROVIDENT SAVINGS BANK
BALTIMORE, MD. 21201

For

Benjamin F. Raney

6A ↑

DOCUMENT 6

6B ↓

502

Nancy Radcliffe
ROBERT PRIMACK
3215 North Charles St., Apt. 206
Baltimore, MD 21218

NO. 234

December 3 19 79 7-89/520

PAY TO THE ORDER OF CFL $ 20.00

Twenty and no/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy Radcliffe

12-11-79 1,1

B.d.t

NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST., APT. 206
BALTIMORE, MD. 21218

NO. 235

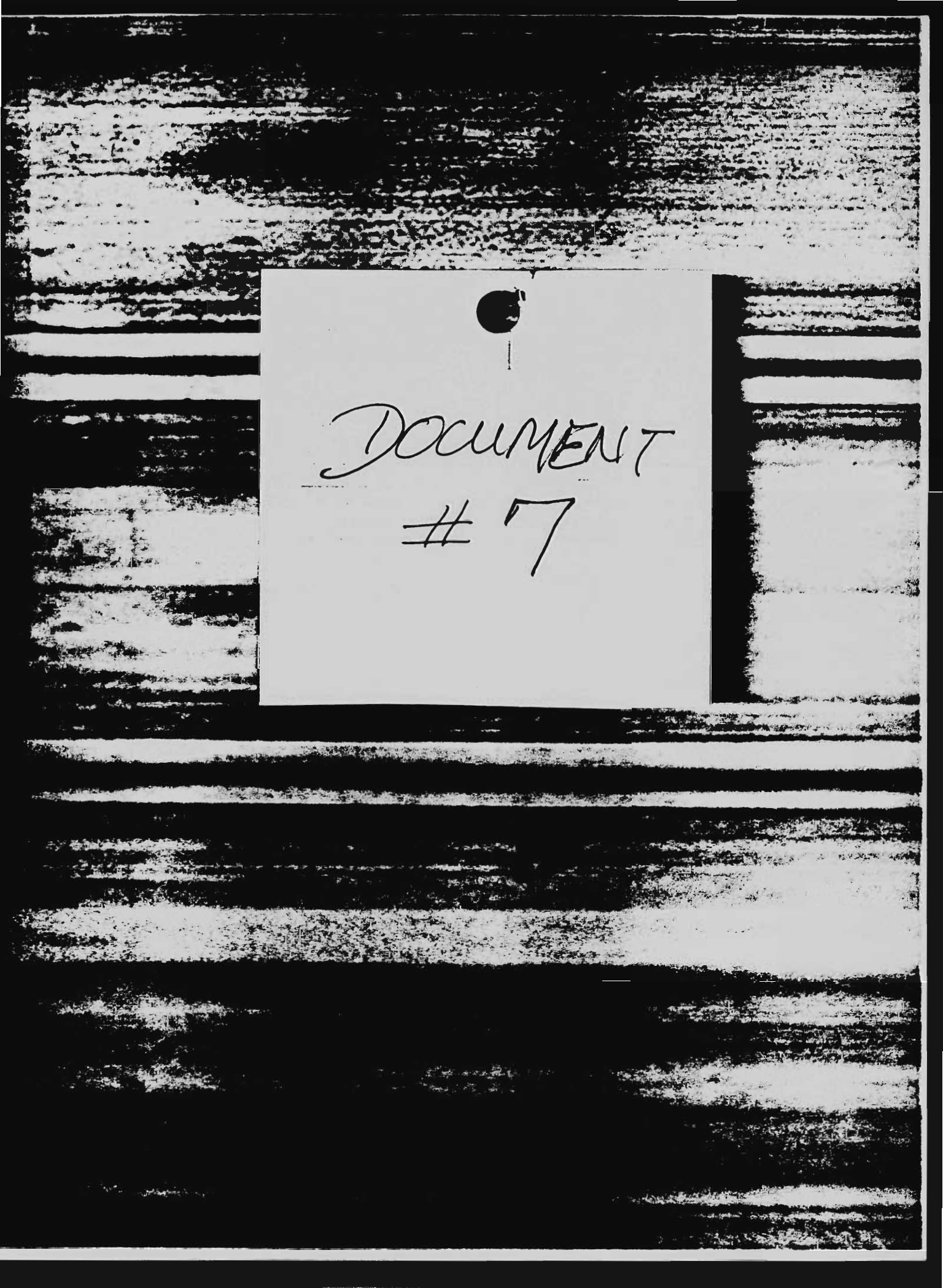
December 9 19 79 7-89/520

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty Five and no/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

Nancy B. Radcliffe


DOCUMENT
#7

DATE 1-15-80 DEPOSIT CODE 1-2

OK
BKS

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.
DRAWER WITHOUT RECOURSE IN CASES STATED ON REVERSE

DATE Jan 12, 1980

PAY TO THE ORDER OF Citizens for Halbrucke

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

AMOUNT 3857 SUBJECT TO CONTRACT REFERRED TO ON REVERSE $ 1 5 $ 1 1 0 0 0

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARIBAULT

Kevin Salisbury 1909 N Forest Pk Ave
PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

⑆091900533⑆ 189 2957627⑈ 90 Balto Md

DATE 1-15-80 DEPOSIT CODE 1-2

DOCUMENT

#8

MD

January 21,1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Salisbury
(signature)

1909 FOREST PARK AVE. T-3
(address)

BALTIMORE MARYLAND
(City) (state)

DOCUMENT
9

9A →

9C (bottom) ↓

9B ↓

DOCUMENT # 9

9A →

9C (bottom) ↓

9B ↓

DOCUMENT
#10

Linkwood Road
Baltimore, Maryland 21210

99

Pay to the order of

Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 19 77

7-16
520

Pay to the order of Citizens for LaRouche $ 50.00

fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo Ball

Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO. 999

7-16
520

4 Nov 19 77

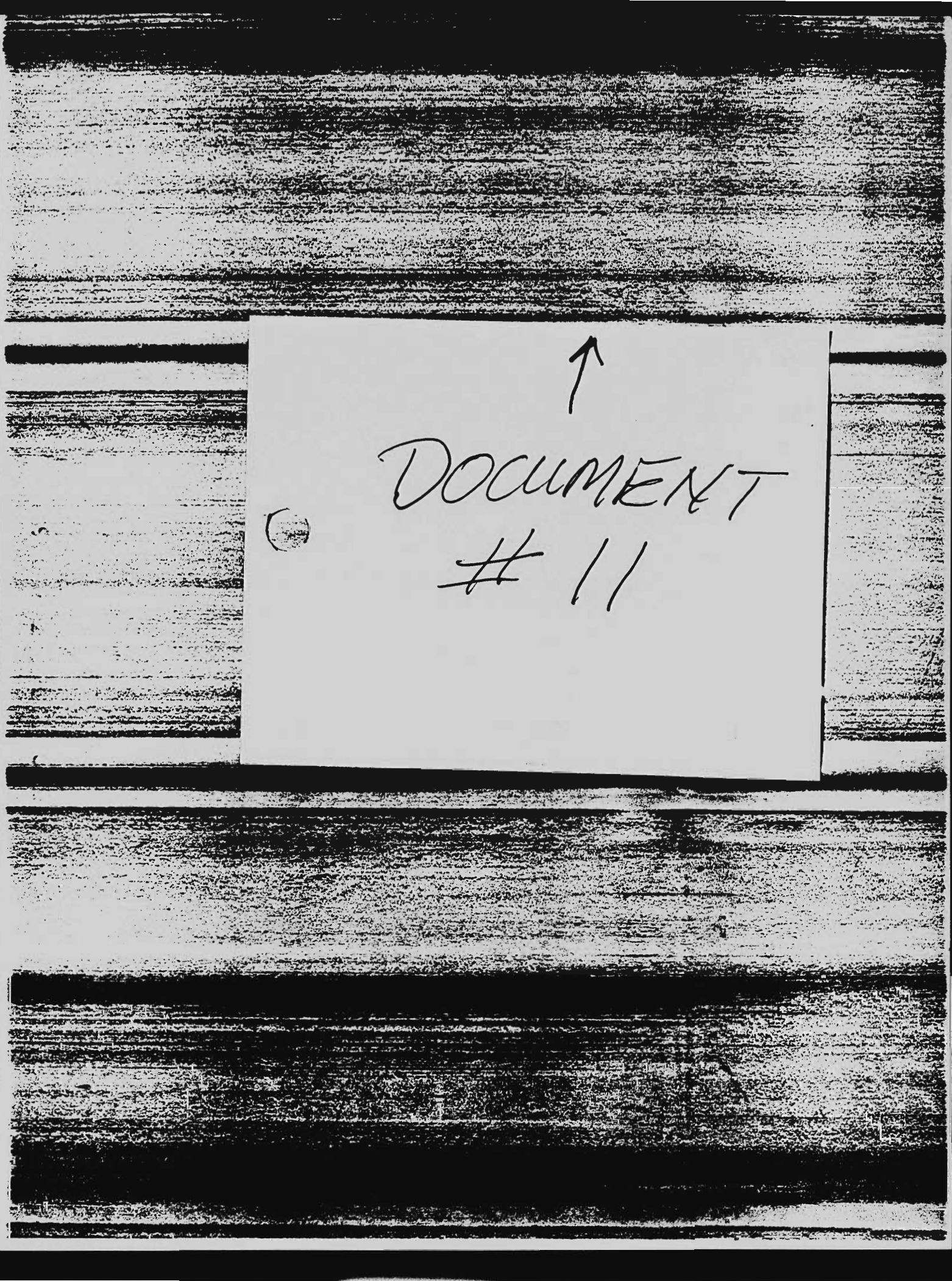
Pay to the order of Citizens for LaRouche $ 40.00

forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania


DOCUMENT
#11

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

Feb 1 19 89

7-16
520

Pay to the order of Others Inc Include $ 15.00

Fifteen and 00/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo _____

Debra J. Hanania

12-11-79 1-1

5-02

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1166

9 Dec 1979

7-16
520

Pay to the order of Citizens S-L Bank $ 200-

two hundred and no/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

DOCUMENT

12

5 01

CITIZENS FOR BAROODHI

P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

Name of contributor Anne C Taylor
Address 1304 Lake St
City Balt State Md Zip
Amt. of contribution 150 —
Contributor's occupation retired.
Place of employment
Address
CFL Representative DHF/BH

AMERICAN EXPRESS MONEY ORDER 23-1 1020

11126

55-466,938,411

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 4/20 19 71 ONE HUNDRED FIFTY DOLLARS 00 CTS

TO THE ORDER OF Citizens for Baroody

James D Robinson
CHAIRMAN

Anne C Taylor 1304 Lake St Lutherville Md
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑆1020⑈0001⑆55 ⑈466938411⑈

ARLINGTON BANKNOTE COMPANY 10-1-70

51

DOCUMENT

#13



5-01

ALAN L. CINSAVICH
2801-C COLDSTREAM WAY
BALTIMORE MD. 21234

NOV 14 1979

NO. 345

November 7, 19 79 7-89 520

PAY TO THE ORDER OF Citizens For LaRouche $ 50 XX/100

Fifty AND NO/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

A. L. Cinsavich

MAY 4 1979

ALAN L. CINSAVICH
801-C COLDSTREAM WAY
BALTIMORE, MD. 21234

NO 315

April 29, 19 79 7-89 520

PAY TO THE ORDER OF Citizens For LaRouche $ 15.00

Fifteen AND NO/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

A. L. Cinsavich

AMERICAN EXPRESS MONEY ORDER 23-1 1020

NOV 14 1979

55-466,938,402

PAY THE SUM OF NOT GOOD OVER $200.

DATE Nov 13 19 79 THE SUM OF DOLLARS CTS

TO THE ORDER OF Citizens for LaRouche

James D. Robinson CHAIRMAN

SENDER'S NAME AND ADDRESS Charles Clark 14 North Hilton St. Baltimore Md.

BEFORE CASHING READ NOTICE ON BACK

Balt

⑆020⑆000 1155 ⑆4669364023⑈

DOCUMENT

#14



12-11-79 1-1

502

Bolt

THOMAS M. OLSEN
SAKIKO N. OLSEN
7916 Springway Road
Towson, Maryland 21204

1663

8 Dec 1979 7-11/520 39

to the order of Citizens for La Rouche $ 22 00

Twenty-Two and Zero Hundredths Dollars

First National Bank of Maryland BALTIMORE

Memo

Thomas M. Olsen

12-4-79, 1-1

AMERICAN EXPRESS MONEY ORDER 23-1/1070

55-466,938,424

PAY THE SUM OF NOT OVER $200

DATE 12-4-79 THE SUM OF TWENTY AND 00 DOLLARS

TO THE ORDER OF Citizens for La Rouche

James D. Robinson CHAIRMAN

SENDER'S NAME AND ADDRESS Edward K. Olsen

BALTIMORE MD

BEFORE CASHING READ NOTICE ON BACK

⑈020⑈000 11:55 ⑈669384248⑈

MEMORANDUM

TO: Federal Bureau Of Investigation Laboratory
Attention: Documents Section

FROM: Federal Election Commission
Charles N. Steele, General Counsel

SUBJECT: MUR 1158 - In re Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania

Statutory violations alleged: 2 U.S.C. § 441f (making a political contribution in the name of another; 26 U.S.C. § 9042 (c)(1)(A) (knowingly and willfully furnishing false information or evidence to the Commission in connection with Presidential primary matching funds request).

Statement of the Facts: The first aspect of the request involves contributions reported by Citizens for LaRouche as having been made by the following individuals: David Sanders, Nancy Radcliff, and Kevin Salisbury. Documentation filed with the Commission as required to evidence these contributions reveals physical dissimilarities among various signatures attributed to each of these three individuals.

The second aspect of the request involves various contributions reported by Citizens for LaRouche as having been made by the three individuals listed above as well as the following individuals: Dr. Debra J. Hanania, Debra J. Hanania, Anne R. Taylor, Charles Clark, and Ernest K. Pulsifor. Some of the documentation filed with the Commission to evidence these contributions reveals physical similarities in the writing of the words "Citizens for LaRouche".

THE COURT: How about on the voting list, are you registered as an Independent --

THE WITNESS: No, I am registered on the voting list as Labor Party. I registered as Labor Party. If you go down and ask the Board of Elections, they will tell you Labor Party.

THE COURT: No Democratic, Republican or Independent?

THE WITNESS: No, sir.

THE COURT: That means you cannot vote, then, in any Primaries?

THE WITNESS: Like an Independent, that's right, cannot vote in a Primary.

THE COURT: Nor can you vote in the General, can you?

THE WITNESS: Yes, I can vote in the General. Labor Party, Independent, American Party, Democratic or Republican can all vote in the General.

Q (By Mr. Marcus) Are you the only Labor Party candidate running in Baltimore City this year?

A That's correct, as far as I know.

Q Was that a decision of the Party?

A No, it was my decision to run.

Q I see. Now, do you know if Mr. LaRouche has a campaign committee here in Maryland?

A No, I do not.

Q Now, when these New Solidarity newspapers are sold like on the street, what happens with the cash that is raised from those sales?

A I do not know.

Q Who would know?

A I would presume Mr. Freeman might know.

MR. MARCUS: Witness with you.

MR. MITCHELL: No questions.

THE COURT: You are excused.

(Witness excused.)

MR. MARCUS: Mr. Freeman.

Thereupon --

LAWRENCE FREEMAN

a Witness, produced for oral examination on call of the Plaintiff, having been first duly sworn by the Notary Public,

was examined and testified as follows:

DIRECT EXAMINATION

BY MR. MARCUS:

Q Mr. Freeman, for the record would you state your address?

A My address is 4004 Linwood Road.

Q That is in Baltimore City, isn't it?

A Yes, it is.

THE COURT: Keep your voice up so I can hear you, and the Court Reporter can hear you and your lawyer can hear you, so he will know what to object to.

Q (By Mr. Marcus) Now, you are a member of the National Executive Committee of the U. S. Labor Party?

A No.

Q You are not. You are, however, the Chairman of the Labor Party in Maryland?

A Yes, I am.

THE COURT: Keep your voice up.

Q (By Mr. Marcus) Now, do you receive any salary or stipend from the U. S. Labor Party?

A. No, I do not.

Q. Do you receive any salary or stipend from the National Caucus of Labor Committees?

MR. MITCHELL: Objection.

THE COURT: Overruled.

A. No, I do not.

Q. (By Mr. Marcus) Are you working?

A. Yes.

Q. For whom do you work?

A. I work for New Solidarity International Press Service.

Q. And you get money for that work?

A. Yes, I do.

Q. Now, this New Solidarity International Press Service has offices in the Medical Arts Building; is that correct?

A. Yes, it does.

THE COURT: How much is your salary a year?

MR. MITCHELL: Objection to the Court's question.

THE COURT: Overruled.

THE WITNESS: A year? About $4,000 over a year.

Q (By Mr. Marcus) And what do you do in exchange for that money?

A I gather news, analyze it, and give it to New Solidarity in New York City for articles, whatever they do with it, for dissemination of ideas.

Q Now, those articles are printed in the newspaper called New Solidarity; is that correct?

A Yes, they are.

Q And New Solidarity is actually published by Campagner Publications, Inc.; is that correct?

A I believe so.

Q And it is distributed, is it not, by members of the U. S. Labor Party?

A Yes, it is.

Q Including in Baltimore?

A Yes.

Q Now, do you personally sell copies of New Solidarity?

A No, I do not.

Q Do you know who does?

A Yes.

Q Would you tell the Court, please?

MR. MITCHELL: Objection.

THE COURT: Sustained.

Q (By Mr. Marcus) Can you tell me the names of people in Baltimore, to your knowledge, who on a regular basis sell by street sales New Solidarity newspapers?

MR. MITCHELL: Objection.

THE COURT: Overruled. This is for the U. S. Labor Party, right?

MR. MARCUS: Yes.

A On a regular basis there are selling the newspaper, okay, William Salisbury sells the newspaper.

Q (By Mr. Marcus) Where does he live?

A In Baltimore City.

THE COURT: But where?

THE WITNESS: He lives on Abell Street.

Q (By Mr. Marcus) Anybody else?

A William Sinclair sells New Solidarity.

Q Does he live on Abell also?

A No, he lives on St. Paul Street.

Art Murphy sells New Solidarity.

Q He lives on Abell Street, doesn't he?

A Yes, he does.

Q Now, when these fellows go out and sell these newspapers, they get money, right?

A Right.

Q A lot of coins, and maybe some dollar bills and stuff like that.

What do they do with that money?

A They give it to Debra Freeman, and she wires the money up to New York.

Q Is she always the one who sends it up to New York?

A She may not always send it, but if she doesn't send it, she will instruct someone to send it.

Q And she keeps the records of sending the money up to New York?

A No, there are no actual records.

Q There are no records kept?

A Not a consistent record.

Q I see.

THE COURT: What would prevent -- suppose $500 was

given to her as a result of sales, what would prevent her from just sending $250 if no records are kept?

THE WITNESS: The honesty of our members is impeccable.

THE COURT: And if there are $500 worth of sales, what prevents somebody from turning in just $250?

THE WITNESS: Never happens in our organization. We have the most moral people you would ever find.

Q (By Mr. Marcus) Let me ask you this question. Are you the chief member of the U. S. Labor Party in Maryland?

A I am the Chairman of the Party.

Q If anybody would know what is going on with the Labor Party in Maryland, it would be you, right?

A I would know certain aspects of it.

Q What aspects would you not know?

A Well, I am not on top of all the day-to-day functions of all the Party members. In fact, I know very little about that. My primary activity is educating and collaborating with the various political offices throughout the area.

Q What about getting leaflets run off and printing services, do you handle that?

A No, I don't.

Q Who does?

A A number of different people.

Q Like?

A For example, Debra may be involved, Bob may be involved, William may be involved, Kaye may be involved. It's done at various places.

Q I show you Plaintiff's Exhibit No. 2. Do you recognize it?

A Yes, I do.

Q Who ran that off?

A I do not know.

Q It wasn't you, though?

A I wrote it.

Q What did you do when you finished writing it?

A I gave it to someone in the office.

Q Name?

A Well, this thing was written back in February of 1979, I believe. I don't know who I gave it to.

THE COURT: Who was working in the office with you?

THE WITNESS: Well, the names I read off, the names I mentioned, are the names of people who work in the office. We have in the office anywhere from five to fifteen people, in the office.

THE COURT: They don't get paid, by the way?

THE WITNESS: No.

THE COURT: They are all volunteers?

THE WITNESS: Absolutely.

Q (By Mr. Marcus) You are the only one that gets paid, right?

A No, I don't get paid from the U. S. Labor Party.

Q Do they get paid from one of the other --

A No, they are volunteers.

THE COURT: How many hours a day do they put in?

THE WITNESS: Some people a couple of hours, five to six hours, some people just one hour a week.

Q (By Mr. Marcus) When they sell this newspaper, they get -- it's a quarter apiece, isn't it?

A Yes.

Q Do they get a piece of the action?

A. They don't get any of that money.

Q. It all goes up to New York?

A. Yes.

Q. So they volunteer their services to sell this newspaper?

A. Absolutely.

Q. Where does Mr. Salisbury work?

A. I don't know.

Q. Well, you have known him for at least five years?

A. Well, I don't keep track of his record. He used to work in the Post Office at one time. I know he collects benefits from the Army, because he is a wounded veteran. But I don't keep track of personal records.

Q. How about this, do you recognize this (handing), Plaintiff's Exhibit No. 3?

A. Umh-humh (nodding head affirmatively).

Q. Did you prepare that?

A. No, I did not.

Q. Did you have it run off?

A. No, I did not.

Q. Do you know who did?

like Debra, or Mr. Primack, they would not be capable of withholding any information?

THE WITNESS: As far as I know, those two individuals, and I have known my wife almost ten years, I don't think so.

THE COURT: Go ahead.

Q (By Mr. Marcus) So you don't know who got that thing printed?

A No, I do not.

Q And you are Chairman of the committee?

A I am Chairman of the U. S. Labor Party for Maryland.

Q Now, this Plaintiff's Exhibit No. 2, how did you make sure that that would get printed?

A I gave it to a person in the office at that time, and --

Q But you don't remember who the hell it was?

MR. MARCUS: I apologize, Your Honor.

A As I say, I wrote this back in the beginning of the year for the State Legislature of Maryland, and I don't remember five months back who I gave it to.

THE COURT: Did you write that letter, or Debra?

THE WITNESS: No, I did not.

THE COURT: Did she write it?

THE WITNESS: I believe she did.

THE COURT: With your sanction, approval?

THE WITNESS: I agree with what she wrote. I think we were both quite angry at seeing her beat up.

THE COURT: Is that a moral type of letter?

THE WITNESS: That is a very moral type of letter. When I see my wife beat up in front of my office, I find it very mild.

THE COURT: Not talking about as far as Grenville Whitman is concerned, but I am talking about statements made by other people --

THE WITNESS: We are stating the truth, and sometimes the truth is very unpleasant to hear, but that has been the case throughout history. I would have to read it over, but I find it most moral as far as people who are involved in physical intimidation.

Q (By Mr. Marcus) Now, the premises in the Medical Arts Building, Suites 301 and 302, you negotiated the lease,

didn't you?

A. I talked to the representative from the organization about obtaining that office.

Q. You mean from The Hammerman Organization, the landlord?

A. Yes, though I never talked to him. I talked to the representative in the building.

Q. You talked to a woman, right?

A. Yes.

Q. And when you came in there to rent space, for the U. S. Labor Party, is that correct?

A. No, I rented space for New Solidarity.

Q. That is not the question I asked. When you walked in there --

A. No, I didn't.

Q. You said nothing about the U. S. Labor Party when you walked in?

A. No, I mentioned it to her as --

Q. Continue. As what? As one of the organizations that was going to use the office?

A. No, I never said to her --

Q What did you say about the U. S. Labor Party?

A In fact, at the time I went into the office with her, I don't think it came up in the first several conversations.

Q Well, in one of the conversations it came up. What did you say?

A It didn't actually come up, but I mentioned to her at one point that I was a member of the U. S. Labor Party, and that maybe mail would be coming to the U. S. Labor Party at that office.

Q And it does?

A Absolutely.

Q A lot of mail comes for the U. S. Labor Party, right?

A Not as much as I would like.

Q What does come in the mail for the U. S. Labor Party at that office?

A Very, very few pieces of literature come in for the U. S. Labor Party.

Q And that disappoints you. You would rather there was more literature?

A. I don't know.

Q. And more money?

A. More money I certainly would like to have.

THE COURT: For what reason?

THE WITNESS: So the organization could have money.

THE COURT: What organization?

THE WITNESS: The U. S. Labor Party.

Q. (By Mr. Marcus) How much does it have now?

A. I have no idea.

Q. Who does?

A. The treasurer of the U. S. Labor Party.

Q. That woman up in New York you mean?

A. Yes, Nancy Spannaus, the treasurer of the U. S. Labor Party.

Q. And there is no money down in Maryland, right?

A. Not a cent.

Q. All the money is up in New York?

THE COURT: Where do they keep the money, what bank?

THE WITNESS: I don't know the bank.

THE COURT: This woman would know the bank?

THE WITNESS: She certainly would, as treasurer.

Q (By Mr. Marcus) What is the address of the U. S. Labor Party in New York?

A The Post Office Box --

Q I don't want a Post Office Box, I want to know where they are.

A That's the only address --

THE COURT: If you would go to see this lady -- what is her name?

THE WITNESS: Nancy Spannaus.

THE COURT: Where would you go to see her? You wouldn't go to a Post Office Box.

THE WITNESS: No, I would meet her in New York.

THE COURT: Where? What house, what premises?

THE WITNESS: At her house, or other people's house.

THE COURT: Well, where is her house?

THE WITNESS: It's in Washington Heights.

THE COURT: Well, suppose you went to New York on the train. After you arrived in New York, where would you --

THE WITNESS: She moved, and I haven't been to her

new apartment. In fact, I haven't seen her. I see her, actually, I have seen her more in Washington and in Virginia and so forth than I have seen her in New York.

THE COURT: But I think the Plaintiff is entitled to the address of the treasurer, home address, office address.

THE WITNESS: I will write and --

THE COURT: You will write to whom?

THE WITNESS: To the Post Office Box, or make a telephone call to her house.

THE COURT: Suppose you had to make a telephone call to her house, what would her telephone number be?

THE WITNESS: I don't have it with me.

THE COURT: You don't have it?

THE WITNESS: Not on me.

THE COURT: All right. It's the order of the Court that the Plaintiff be furnished with the full name and address and telephone number of Nancy --

Spell her last name.

THE WITNESS: I believe it's S-p-a-n-n-a-u-s.

THE COURT: (Continuing) -- Spannaus, on or before

the close of court on Friday, the 13th of July, 1979. And for all intents and purposes, the close of court shall be deemed to be 4:00 p.m. Do you understand that? That is an order of the Court. Failure to comply, and you will leave yourself open to contempt of court action.

THE WITNESS: I don't think there will be any problem.

THE COURT: Okay. I just have to notify you of that.

THE WITNESS: I don't think there will be any problem with that.

THE COURT: We can dispense now with that aspect of the case.

MR. MARCUS: Right.

Q (By Mr. Marcus) Now, you have that lease for space at the Medical Arts Building, and the Labor Party uses the space, right?

A Umh-humh (nodding head affirmatively).

Q And International Press Services, Inc., uses the space?

A They rent the office.

Q Do they use it?

A Yes, I use it.

Q You are the New Solidarity International Press Service, right?

A Umh-humh (nodding head affirmatively).

Q Now, what Labor Party activities take place in that office?

A We meet, we talk to people over the phone there, people come to the office and we talk about the Labor Party.

Q Why don't you pay the rent, then?

MR. MITCHELL: Objection.

Q (By Mr. Marcus) I mean, you use the facilities.

A I don't pay any rent.

THE COURT: Sustained.

Who pays the rent?

THE WITNESS: New Solidarity International Press Service.

THE COURT: Where does the check come from?

THE WITNESS: From our New York office.

Q (By Mr. Marcus) You mean the address at West 58th Street?

A. Yes.

Q. The U. S. Labor Party does not have --

THE COURT: Is Nancy Spannaus a member of this Press Service?

THE WITNESS: I don't know.

THE COURT: How long have you known Robert Primack?

THE WITNESS: Bob, three to four years.

THE COURT: Did you know him before he came to Baltimore?

THE WITNESS: No.

THE COURT: Well, when he came to Baltimore, did you know he was coming? Did someone from New York notify you that he was coming here?

THE WITNESS: Yes.

THE COURT: Who notified you that he was coming here?

THE WITNESS: I couldn't possibly remember back four years.

THE COURT: Was it a man, was it a woman named Carol White?

THE WITNESS: It could have been Carol, but I really

don't remember. That was over four years ago.

THE COURT: Whose decision was it to allow the U. S. Labor Party to use these premises in the Medical Arts Building?

THE WITNESS: I don't know. It must have been worked out between the U. S. Labor Party and New Solidarity International Press Service, but I was not the one who made that decision.

Q (By Mr. Marcus) You didn't make that decision?

A No.

Q You are the only representative of this Press Service in Baltimore, right?

A No, I think Debra is working for the Press Service.

Q Your wife?

A Yes.

Q Does any member of the U. S. Labor Party have a key to this Suite 301 in the Medical Arts Building?

A Yes.

Q Who?

A Well, about, about a dozen people.

Q You are the one who got the key originally from the

landlord?

A Right.

Q Did you personally make copies?

A I made some.

Q To whom did you give them, all the members of the Labor Party?

A No, not by a long shot. Just to a few of the members.

Q To your wife?

A Yes.

Q Bob Primack?

A Yes.

Q To Salisbury?

A Yes.

Q Belinda, whatever her name is?

A Belinda DeGrazia.

THE COURT: Steven Warm?

THE WITNESS: Steve Warm. I don't know if I handed keys to them, but I'm sure I knew that they got keys.

Q (By Mr. Marcus) Nancy Radcliffe?

A Sure.

Q And you decided that you had the right to give these keys out?

A Yes.

Q Because these people are members of the U. S. Labor Party?

A Yeah.

Q You didn't get any instructions from New York from the New Solidarity International Press Service, Incorporated, that you were authorized to give copies of the key to any member of the U. S. Labor Party, did you?

A I didn't give -- I gave keys to some of the members.

Q Members who are associated with the New Solidarity International Press Service, Incorporated?

A I don't think there were any others, although informally we had a lot in Baltimore about six, seven years ago.

Q As a matter of fact, that office has been the offices of the Press Service, the U. S. Labor Party and the National Caucus of Labor Committees, right?

A Yes, to the best of my knowledge, since I have been here.

THE COURT: Why would this Press Service be willing to pay rent for other organizations to share their premises or offices?

THE WITNESS: I'm not involved in any of those discussions.

THE COURT: I mean, why wouldn't they ask a contribution from the U. S. Labor Party or other organizations that share these premises, do you know?

THE WITNESS: I do not know.

Q (By Mr. Marcus) You are the one who made the decision to give all these keys out, right?

A As I said, informally I gave some keys out.

Q And when the office was open at 2539 St. Paul, it was the office for the Press Service and the Caucus of Labor Committees and U. S. Labor Party and whatever else, Campagner Publications also?

A Yes.

Q And you all used that?

A Yes.

Q When did you first come to Baltimore?

A Oh, I came in 1974.

Q Somebody sent you down here?

A No.

Q You just decided to come?

A No. There was a discussion, it was suggested --

Q You and who else discussed it?

A At that time?

Q Yes.

A You know, there were fifteen, twenty people, and we kicked it around.

Q Were these people members of any organizations?

A I don't know. I mean, some are members of the U. S. Labor Party.

Q Were any of them members of New Solidarity International Press Service?

A I don't know.

THE COURT: Let me ask one more question. I'm sorry to keep interrupting, but I have to straighten this thing out.

Is there any reason why you are not making or you cannot make a full disclosure of the relationship between the U. S. Labor Party, the Press Service and these other

organizations with which you are involved? Is there a reason?

THE WITNESS: I don't know. I honestly do not know.

THE COURT: What kind of education do you have?

THE WITNESS: I graduated from college.

THE COURT: What kind of degree?

THE WITNESS: Bachelor of Arts.

THE COURT: Any major, or any other subject --

THE WITNESS: Political science and economics.

Q (By Mr. Marcus) Which college?

A. C.C.N.Y. in New York.

Q That is a good school, isn't it?

A. Not much.

THE COURT: You don't know --

THE WITNESS: I am just running one branch office.

THE COURT: You don't know the organization organizers or the makeup of the U. S. Labor Party and these other organizations? You went into it blindly, or because you were impressed with their ideals, without going any further --

THE WITNESS: I do not know the involvement or any

of the connections financially in this arrangement. I am not privy to that.

THE COURT: What is the reason for your investment of your time and your advice into this work?

THE WITNESS: Because the Labor Party's ideas, right now it is essential that they be discussed if the population is to turn this country away from the poliferation of drugs and the economic crisis. And I agree with those ideas, and fully agree that we must begin to offer an alternative political picture for people to join in this country, and I have volunteered my services for that purpose.

THE COURT: But, as I understand it from the testimony from the previous witnesses, you don't do any advertising per se for members, you only attempt to get people interested through word of mouth. You keep no membership rosters, is that correct?

THE WITNESS: No, we don't.

THE COURT: There is no mailing list --

THE WITNESS: That's right.

THE COURT: (Continuing) -- where you can call a meeting to generate enthusiasm, so these people can spread

out and bring more people in?

THE WITNESS: Unfortunately, because of the lack of financial resources, it's a very -- it's not the type of operation that I would like to run if I had more money.

THE COURT: Do you think that it's an exercise in futility to be working as you are, or is there some method --

THE WITNESS: Oh, no.

THE COURT: (Continuing) -- some method, to coin a phrase, method to your madness?

THE WITNESS: Oh, no. We have had a tremendous effect in parts of the State of Maryland.

THE COURT: And this tremendous effect was generated just by this handful of people under the guise of the U. S. Labor Party?

THE WITNESS: That is actually the way it has worked throughout history. A small number of people can move mountains.

Q (By Mr. Marcus) But it takes money to move mountains?

A. Money is a very important feature.

Q Has the Labor Party selected an official candidate

for President --

A. No.

Q. So you haven't collected any money?

A. No.

Q. The U. S. Labor Party hasn't collected any money, then?

A. No.

Q. Has the subject of this $30,000 libel judgment come up at any meetings of the U. S. Labor Party?

A. No. We discussed it, you know, informally at meetings. I discussed it with Bob Primack when we were involved in the trial.

Q. But since the judgment, has there been any discussion of the judgment?

A. Sure.

Q. Has there been any discussion of paying it?

A. Sure.

THE COURT: This judgment, by the way, could be paid, couldn't it? I mean, there is money available somewhere --

THE WITNESS: Not to my knowledge.

THE COURT: (Continuing) -- to pay this judgment?

THE WITNESS: To my knowledge, there is not.

THE COURT: The U. S. Labor Party is in effect bankrupt?

THE WITNESS: I don't know. You would have to talk to the treasurer.

THE COURT: If they are, maybe -- that is something for you to be checking on. You may not have a client.

Q (By Mr. Marcus) Well, you are paying him, aren't you? You are paying Mr. Mitchell, aren't you? He isn't working for free.

MR. MITCHELL: He doesn't work for free, and I will stipulate to that.

Q (By Mr. Marcus) Isn't that correct? You are paying Mr. Mitchell, right?

THE WITNESS: I don't know if I am required to disclose my financial arrangements for paying Mr. Mitchell.

MR. MARCUS: I ask that he be instructed that he has to answer the question.

THE COURT: Are you paying --

MR. MITCHELL: I object to the question. It seems

to me this involves the attorney-client privilege.

THE COURT: You are here representing the United States Labor Party?

MR. MITCHELL: That's right.

THE COURT: This man is the top banana for the U. S. Labor Party in the State of Maryland; aren't you?

THE WITNESS: That is one way of describing it very favorably.

THE COURT: So somewhere along the line a bill has to be submitted. Now, the U. S. Labor Party is going to pay Mr. Mitchell?

THE WITNESS: As I say, I do not pay Mr. Mitchell.

THE COURT: I asked, is the U. S. Labor Party --

THE WITNESS: To my knowledge, the U. S. Labor Party has not paid Mr. Mitchell.

THE COURT: You better pull back here a second and regroup.

Q (By Mr. Marcus) Isn't it a fact that you personally carried literally in a brown paper bag, a bagful of money to Mr. Mitchell's office?

A. A brown paper --

Q (Continuing) I remind you that you are under oath.

A I don't remember carrying a brown paper bag --

Q What color of paper bag was it?

A I don't remember carrying a paper bag.

Q Who carried it?

A I don't know.

Q Was it a black plastic bag, or a --

A I have no knowledge of anybody carrying a bag.

Q Isn't it a fact that cash money, not a check, but cash money has on more than one occasion been given to Mr. Mitchell in payment for his services?

MR. MITCHELL: I object. I don't think that is a proper question.

THE COURT: If it was, then we are going to have to find out where the money came from. If it came from the U. S. Labor Party, then someone is not telling the truth.

THE WITNESS: To the best of my knowledge, I have no knowledge of any person carrying a bag of money to Mr. Mitchell.

THE COURT: Just answer the question. Did you carry money to him in any container?

THE WITNESS: No, I did not.

THE COURT: You haven't paid him?

THE WITNESS: I don't pay Mr. Mitchell.

THE COURT: Who does?

THE WITNESS: I don't know exactly who Mr. Mitchell gets paid by, but there are ways. For example --

THE COURT: Oh, come on now.

THE WITNESS: I am being perfectly honest.

MR. MARCUS: He is going to be the next witness, if you continue with this --

THE COURT: Well, I move that be stricken.

MR. MARCUS: I apologize, Your Honor.

THE WITNESS: I won't accept your apology.

MR. MARCUS: I wasn't apologizing to you, I was apologizing to His Honor.

Q (By Mr. Marcus) By whom does he get paid?

A To the best of my knowledge, he gets paid by people who want to see that his services are continued.

Q Who are those people?

A I do not know the names.

Q Who knows the names?

A. I think you would have to check with Nancy Spannaus.

Q. Are you telling me that the money all comes from New York directly?

A. I don't know if it comes from New York directly.

Q. Then why would Miss Spannaus know about it?

A. I am saying that she is the most logical one because she is the treasurer.

Q. You are speculating, then?

A. Yes.

Q. You are the one who hired Mr. Mitchell, is that correct --

A. Yes.

Q. (Continuing) -- to represent the Party?

A. Yes.

Q. And you paid him a retainer?

A. Right.

Q. And where did the money or the check come from that you gave Mr. Mitchell at that time?

A. If I am correct, that one check would be from the Labor Organizers Defense Fund.

Q. Who?

A. Labor Organizers Defense Fund.

Q. Where are their headquarters?

A. They are in New York City, and I don't know if they exist anymore.

Q. I see. Where did the other checks come from?

A. Another check may have come from -- I am speculating, but I think the National Caucus of Labor Committees paid Mr. Mitchell some money.

Q. That is also a New York outfit, isn't it?

A. Well, it's a collection of people who --

Q. It's the core group of the U. S. Labor Party, right?

A. Right, but it's not a corporation or anything.

Q. Neither group is a corporation?

A. Right. And I think some money came through Mr. --

THE COURT: It's beyond my imagination, Mr. Freeman, that you don't know.

THE WITNESS: Well, if I can explain --

THE COURT: It's just beyond my imagination. I have been sitting on Supplementary Proceedings going on twenty

years, and I am appalled that here you are the head man of this U. S. Labor Party, you retained an attorney, a prominent attorney here in the city, and I am sure he is not working for nothing unless he is a member of the U. S. Labor Party and is donating his services --

THE WITNESS: Not to my knowledge.

THE COURT: (Continuing) -- which I doubt that he is donating his services. And as I understand this file -- it's quite thick -- that you don't know how he is being paid, what he is being paid, it's appalling to me.

THE WITNESS: Let me explain to you. It's not as difficult to understand as you might think. My activities of working with people in the U. S. Labor Party in Maryland, and the U. S. Labor Party in the District of Columbia and the U. S. Labor Party in the State of Virginia, my activities consist of talking to these people, of meeting with these people and discussing ideas with these people, giving classes, which I give in universities throughout the three cities, takes up almost the entirety of my time. If I was required also to be in charge of knowing the financial policies of the organization, then I would not be able to carry on the

activities that I now do. That is why the organization itself has a treasurer in New York, and as far as I know all bills are paid from New York City. As far as I know, all monies are sent from New York City, and it's a centralized collection and disbursement of money. So I would not have to spend my time being involved --

THE COURT: Did Mr. Mitchell send you a bill, and then you forwarded it to the U. S. --

THE WITNESS: Yes.

THE COURT: (Continuing) -- Labor Party in New York?

THE WITNESS: Yes.

THE COURT: And then they in turn forward a check -- do they ever forward you a check to pay him?

THE WITNESS: Checks have been forwarded. Then the check is picked up at the Post Office and given to Mr. Mitchell.

Q (By Mr. Marcus) Whose checks were they?

A I don't remember.

Q You don't know?

A I don't remember.

Q Were they drawn against the U. S. Labor Party?

THE COURT: You don't remember what? Don't you remember if it was the U. S. Labor Party, or this International Press Service --

THE WITNESS: As I said --

THE COURT: What was the last check which you received from New York to pay Mr. Mitchell?

THE WITNESS: I don't remember. There has not been a check that I received from New York in several months.

Q (By Mr. Marcus) Because he has been paid lately in cash; is that correct?

THE WITNESS: Not to my knowledge.

THE COURT: Have you ever paid Mr. Mitchell in cash?

THE WITNESS: No.

THE COURT: Has your wife ever paid Mr. Mitchell in cash?

THE WITNESS: Has my wife ever given Mr. Mitchell a cash payment?

THE COURT: That you have knowledge of.

THE WITNESS: I am saying that I don't remember the exact time --

THE COURT: Well, ever?

THE WITNESS: It's possible, yes.

THE COURT: I don't want possibilities or probabilities. That you actually have knowledge of.

THE WITNESS: I am trying to think if Debra actually gave Mr. Mitchell --

Q (By Mr. Marcus) Let me see if I can --

MR. MITCHELL: Let him answer the question.

MR. MARCUS: I want to jog his memory. And if you can't think of the answer, I am going to call Mr. Mitchell as a witness. Now I don't want to do that to a fellow member of the Bar and embarrass him, but if I've got to, I am going to ask him where the money came from.

THE WITNESS: He may know actually more in terms of how he has been paid than I do, because I am not involved in finances.

THE COURT: Suppose if he says that you paid him five hundred or a thousand dollars, or two thousand or two hundred or one hundred dollars?

THE WITNESS: I paid him? As I said, in the beginning when we retained him, I gave him a check, and I may

have given him one or two more checks after that.

Q (By Mr. Marcus) And you can't remember whose checks they were?

A I said that one was the National Caucus of Labor Committees, and one of the checks was maybe from the Labor Organizers Defense Fund. To the best of my knowledge, I do not believe that I ever saw a U. S. Labor Party check that paid for Mr. Mitchell's services.

Q (By Mr. Marcus) Why is the National Caucus of Labor Committees paying the legal bills for the U. S. Labor Party?

A I do not know.

Q Have you asked them to?

A No, I haven't.

Q Have you ever asked them to do that, asked Mr., whatever his name is?

A No.

Q You are on at least two Executive Committees of the U. S. Labor Party, isn't that correct?

A No, it is not.

Q That is not correct. Why would your wife have

testified to that in court --

A. I think she testified that I am on the National Committee of the U. S. Labor Party.

Q. Oh, you are on the National Committee of the U. S. Labor Party?

A. Yes.

Q. Does that meet in New York?

A. It has met in New York.

Q. Has met in New York?

THE COURT: I am going to recess for three minutes to let you take him into the other room and talk with him, counsel, to see if you can get him to recall -- off the record.

(Thereupon, a short recess was taken following off-the-record discussion.)

THE COURT: Back on the record.

Does he now remember where he got --

MR. MITCHELL: He is prepared to answer the question.

Q. (By Mr. Marcus) Now, do you know where the money came from to pay Mr. Mitchell?

A. Some of the money came from -- well, basically it came from all categories of people. For instance, some of the relatives of the members involved in the initial suit, which was four people. They constituted a very large sum of the payment to Mr. Mitchell for his services, and, in fact, some of these people still are helping to pay the legal expenses of Mr. Mitchell.

Q. Would you name those people, please?

A. Well, I don't want to subject these relatives to any kind of harassment.

Q. It's up to the Judge --

MR. MITCHELL: The relatives are not parties to the judgment.

THE COURT: Well, let's find out whether or not these people are members of the U. S. Labor Party or any of these other organizations that have been mentioned during this testimony. Are they?

THE WITNESS: Well, some of them are, and some are not.

THE COURT: Tell me the ones that are.

THE WITNESS: John Ascher.

THE COURT: Who?

THE WITNESS: John Ascher.

THE COURT: Where does he live?

THE WITNESS: He lives in Virginia.

MR. MARCUS: He was a Defendant, but he got out.

THE WITNESS: He contributed money to pay.

Bob Primack, he was a party to the original case.

THE COURT: And he is a contributor?

THE WITNESS: I don't think he contributed himself, but I know his relatives have.

Q (By Mr. Marcus) Who are not members of the Party?

A Not to my knowledge. And Steven Browder.

MR. MITCHELL: Another original Defendant in the case.

A (Continuing) I know his father gave a great deal of money.

THE COURT: His father lives where?

THE WITNESS: His father now lives in California, or Nebraska. I don't remember the exact place.

Q (By Mr. Marcus) Someplace between here and --

A Out on the West Coast somewhere. When he was told

about the trial and that we needed money to pay our attorney, he gave his son a very substantial sum of money.

Q These are all people who contributed prior to the trial or approximately at the time of the trial?

A Yes. And in the meantime there have been various people from all over the country who have given money and said, Look, we want to see you defended. Some have been members of the Labor Party, and some have not. They said, We want to give you money for your defense.

Q Could you tell us the namesof these people, please?

MR. MITCHELL: Objection to the naming of the people.

Q (By Mr. Marcus) Are they members of the Party?

A Not all are.

Q Just name the ones that are.

A John Ascher --

THE COURT: I mean, from the rest of the country. Madeline O'Hare?

MR. MITCHELL: Madeline Murphy O'Hare.

THE COURT: Madeline Murphy O'Hare, rather.

THE WITNESS: No. The people who are members of the

Party who have given money, like I just said, John Ascher has given money to the Party.

Q (By Mr. Marcus) On more than one occasion?

A I believe on more than one occasion, yes.

THE COURT: The question I asked you, did you pay Mr. Mitchell any money?

THE WITNESS: No. At various times, I think once or twice, what happened, some people outside the Party gave me money, I put it in my bank --

MR. MARCUS: Cash, or check?

THE WITNESS: (Continuing) -- I put it in my bank account, and I think I wrote Mr. Mitchell a check on my own checking account after I put that money in.

THE COURT: Did you ever pay him in cash? Have you paid any portion of his fee in cash, or was any portion of his expenses involved in the prosecution of this case given to Mr. Mitchell in cash?

THE WITNESS: I believe there were a couple of times when we have given a cash sum of money.

Q (By Mr. Marcus) Who delivered those cash sums of money?

A. I am trying to think back on that, because I have been paying Mr. Mitchell for four years, and over a period of four years, I think Bob Primack once gave Mr. Mitchell money in cash.

Q. Do you know where Mr. Primack got that cash money from?

A. No.

Q. Proceeds of selling New Solidarity newspapers maybe?

A. I doubt it. It was probably cash donations. We get donations of ten, twenty, twenty-five dollars, sometimes a hundred, sometimes two hundred or five hundred, because people are not satisfied, and particularly on this case, we probably have had more support than any other legal case we have been involved in.

THE COURT: How do you get them motivated to contribute if you don't advertise?

THE WITNESS: We advertise -- you see, our ideas get out through leaflets, out through news coverage --

Q. (By Mr. Marcus) You put articles in New Solidarity, don't you?

A. New Solidarity articles many times cover ideas and campaigns for the Labor Party.

THE COURT: Do you ever get any money from Labor organizations?

THE WITNESS: Labor organizations?

THE COURT: Like the Teamsters, or Ironworkers, CIO-AFL?

THE WITNESS: No. In fact, many times we are at loggerheads with them.

Q. (By Mr. Marcus) You have a lawsuit going with the Auto Workers, don't you?

A. The U.A.W., they are in trouble on that one.

THE COURT: That is versus the U. S. Labor Party?

MR. MITCHELL: The U. S. Labor Party is the Defendant, and the Auto Workers is the Plaintiff.

THE COURT: Do you have a suit against anyone else in ----------

THE WITNESS: It's possible.

THE COURT: (Continuing) -- in Baltimore?

THE WITNESS: No.

THE COURT: In Maryland?

THE WITNESS: I don't think in Maryland.

THE COURT: How can we find whether any suits have been filed on behalf of the U. S. Labor Party against any Defendant?

THE WITNESS: I would say talk to officers of the U. S. Labor Party.

Q (By Mr. Marcus) You are an officer of the U. S. Labor Party?

A I am a member of the committee.

Q Tell me who the officers are.

A Well, Costas Kalamtigis.

Q Would you try spelling that?

A I'm not sure I could.

THE COURT: Costas?

THE WITNESS: That would be C-o-s-t-a-s. Then K-a-l-a-m-t-i-g-i-s.

THE COURT: m-i-t?

THE WITNESS: I don't think there is an "i" in there.

THE COURT: What is it, Spanish?

THE WITNESS: No, it's Greek.

Q (By Mr. Marcus) Where does he live?

A In New York.

Q That's a big place.

A I don't know his address. He lives in Westchester.

Q What is his position with the Party?

A I would say he is chief of staff.

Q Chief of staff?

A Yes. He is the secretary or something.

THE COURT: Of the U. S. Labor Party?

THE WITNESS: Yes.

Q (By Mr. Marcus) Is Mr. LaRouche an officer of the Party?

A He is not an active functioning officer. He is the Chairman.

Q The Chairman is not an officer?

A No, sir. The officers are the people who hold offices in the Party.

THE COURT: Who is President?

THE WITNESS: I don't know if there is a President.

THE COURT: Don't you get any correspondence from them, any sort of literature telling you what has happened in

California or Illinois?

THE WITNESS: We go out and gather that information.

THE COURT: I know, but doesn't someone write up a summary of -- like you are a committeeman. You obtain and accumulate information and forward it to the national office, and then they accumulate this information. Don't they put out some sort of pamphlet or program --

THE WITNESS: Yes, New Solidarity International Press Service.

THE COURT: And doesn't that paper then show you or indicate who the officers are of the New Solidarity Press and the U. S. Labor Party?

THE WITNESS: Well, it names the editors of the paper. The editors are named, I guess on the editorial pages.

THE COURT: Okay. I don't have any more questions.

Q (By Mr. Marcus) All right, we have got Kalamtigis and Nancy Spannaus. She is an officer, right, the treasurer?

A Yes.

Q Anybody else up there that is an officer?

A. I don't know. Those are the two officers that I know of.

Q. Who gives you your marching orders?

A. I talk to Costas, I talk to Nancy.

Q. What is his phone number, Costas' phone number?

A. I can reach him at -- I have talked to him at his home.

Q. What is his home phone number?

A. Well, if it's actually his home phone number, it's 654, on a special communications system.

Q. In other words, he doesn't have a telephone like normal human beings?

A. I don't know what you are getting at.

Q. I want to call him up on the phone.

A. I can get his number for you. I mean, I can get it. I don't have it with me.

MR. MARCUS: If Your Honor please, we would like to make that an amendment to your order --

THE WITNESS: It's public information.

THE COURT: All right, you will furnish the telephone number.

Q (By Mr. Marcus) Does he have an office?

A Yes. Well, we have an office.

Q Where is the office?

A We have an office of the U. S. Labor Party in Brooklyn, New York.

Q It's in Brooklyn. What is the address in Brooklyn?

THE COURT: He doesn't know the address.

THE WITNESS: It's in the newspaper. If I had a copy of the newspaper, I could tell you the address. It's open to the public.

Q (By Mr. Marcus) In other words, it's the same address as the newspaper and Campagner Publications?

A Yes.

Q In fact, isn't it the case that Campagner Publications and New Solidarity International Press Service and National Caucus of Labor Committees and U. S. Labor Party are one big organization; right?

A Far from it.

Q I'm sorry?

A Far from it.

Q Well, they share office space?

A. Yes.

Q. And they exchange information?

A. Yes.

THE COURT: They are brothers and sisters, are they not? One compliments the other?

THE WITNESS: There is a relationship of them working together, absolutely.

THE COURT: And the officers of each are intermingled with the other?

THE WITNESS: That I don't know.

Q. (By Mr. Marcus) That's probably the case, is it not?

A. Not to my knowledge. But they definitely have relationship. Here we are in Baltimore using offices --

Q. No doubt about it. This Press Service and Spannaus --

A. Nancy Spannaus.

Q. She is also part of that?

A. Right.

THE COURT: Is she Greek also?

THE WITNESS: Spannaus is a German name. Her husband is a German.

THE COURT: Is that u-s or i-s?

THE WITNESS: I think it's a-u-s.

Q (By Mr. Marcus) She is also an officer of the Press Service, right?

A I don't know. She is an editor of the newspaper, but I don't know whether she is an officer.

Q Who signs your checks? I mean, you get checks from the --

A Rodney A. Huth signs the checks, and other --

Q The same guy who signed the lease?

A Yes, I think so.

Q Is he an officer of the U. S. Labor Party?

A No, he's not an officer of the Labor Party.

Q He is not?

A Absolutely not.

Q But he is an officer of this Press Service?

A Must be treasurer. He signs the checks.

Q He is the treasurer of it?

A I don't know. He signs the checks.

Q He also signed the lease?

THE COURT: The lease speaks for itself. He is an

authorized representative.

Q (By Mr. Marcus) Where does he live?

A In New York City.

Q Where do you contact him?

A I have a phone I call him on.

THE COURT: If you were to sign another lease tomorrow, would he come from New York to sign it, or would you mail it in?

THE WITNESS: I would mail it.

THE COURT: In other words, you have to have the authority from someone before you can enter into some sort of contract?

THE WITNESS: Yes. I would mail it to him.

Q (By Mr. Marcus) Where, what address?

A The address of 304 West 58th Street, possibly.

Q So, in other words, this Press Service has two headquarters, one in Brooklyn and one at West 58th Street?

A No. The U. S. Labor Party has an office in Brooklyn, and New Solidarity has an office on West 58th Street.

Q Didn't you testify a moment ago that you all share office space together?

A. No, we are not together.

Q. They share office space here?

A. Yes. We share office space here, and I would say, they probably share office space there, too.

Q. Is there any space occupied by the Labor Party on West 29th Street in New York?

A. No.

Q. Was there ever?

A. I think at West 29th Street there was both -- yes, that was a multi-story building, and there was an office for the Labor Party, and there was an office for New Solidarity.

Q. And also for Campagner Publications, right?

A. Yes, right. We had a couple of floors, and one was on one floor and one was on the other, if I recall correctly.

Q. But that is no longer in use?

A. No.

Q. It's all moved to Brooklyn now?

A. No, New Solidarity Press is on West 58th Street.

Q. And the Labor Party is in Brooklyn, but you don't know the address, and you are going to provide that?

A I can provide it to you right now if you would like. Mr. Mitchell has a copy of the newspaper. I believe it has it right in there, but I'm not sure. I have no objection to giving you that.

(Document handed to the witness by Mr. Mitchell.)

THE WITNESS: It's 26 Court Street, 13th Floor, Brooklyn, New York.

Q (By Mr. Marcus) Now let's get this straight. The thing that has offices there is the U. S. Labor Party, right?

A Umh-humh (nodding head affirmatively).

Q And the National Caucus of Labor Committees?

A Umh-humh (nodding head affirmatively).

Q And Campagner Publications?

A I don't know if Campagner does, but, of course, New Solidarity has an office there because it's listed in their paper.

Q So you don't know if Campagner Publications has an office --

A No. Actually, I have never seen that office.

Q But they might well have?

A Sure.

Q The Labor Party doesn't have any bank accounts in Baltimore, does it?

A No.

Q How about up in New York?

A It could.

Q Is the Fusion Energy Foundation associated in any way with the U. S. Labor Party?

MR. MITCHELL: Objection.

THE COURT: Well, overruled. The question is, are they associated with the U. S. Labor Party?

THE WITNESS: They are an independent foundation, but the Labor Party supports their ideas, and we work and collaborate on a number of events together.

Q (By Mr. Marcus) And they have some membership in common, the two organizations?

A If you want to be a member of Fusion Energy Foundation, you can be.

Q How about the governing bodies of these two organizations, any membership in common?

A Yeah.

Q Would you be able to tell us the names of the

members who are common to both organizations?

A. Well, I know one is Doctor Morris Levitt. He is the Director of Fusion Foundation, and to my knowledge, he is a member of the U. S. Labor Party.

Q. Anybody else?

A. Well, I don't know right offhand who is with the Fusion Foundation.

Q. Are there any other organizations or foundations, or publications, regular publications, which have members in common, that is, that members of their Board of Directors also sit as part of the Board of the Labor Party Committee?

A. I don't know what you mean by that. We are supporters, but to say what organizations, what Boards of Directors, I have no idea. I can't answer the question. If you asked me about the Democratic Party, I couldn't tell you.

Q. I wouldn't ask you that question.

Do you have any knowledge, from your sitting on the governing body of the U. S. Labor Party --

A. Not the governing body, the National Committee.

Q. The National Committee; thank you.

Do you have any knowledge of when this committee plans to pay this $30,000 judgment?

A. I do not know.

Q. Well, you are on that committee.

A. Yes.

Q. Has the subject of this judgment ever come up in that committee?

A. Yes.

Q. When was the last time it came up?

A. I have talked to other National Committee members, and we have just --

Q. When was the last time you did that?

A. Last week.

Q. Last week. And what was the substance of that conversation?

MR. MITCHELL: Objection.

THE COURT: Let's not go into the substance. What was their decision?

THE WITNESS: The decision was that it's an open matter.

Q. (By Mr. Marcus) Open matter?

A Yes.

Q You don't intend to pay?

A I did not say that. I said at this point we don't have $30,000, but it's an open question.

Q Was there any question of paying part of the judgment?

A There was -- they didn't get into any specifics. Basically, we knew the court trial was coming up, knew the Hearing was coming up, and we said, We will have to continue the discussion.

Q So at that time there was no expression of intent to pay the judgment?

A There was no intent to either pay or not pay.

Q When was the last time you actually had a sitdown meeting of what they call the National Committee?

A It was in June of 1978.

Q And was there another one in June of '79?

A No. There was a smaller meeting in '79, but not the full National Committee.

Q Did you attend the meeting in '79?

A Yes.

Q Was there a treasurer's report?

A No.

Q In June of '79 did you happen to talk to the treasurer?

A Yes.

THE COURT: Have you ever discussed whether this debt is going to be paid with Nancy Spannaus, and if you did, when?

THE WITNESS: We have discussed it.

THE COURT: Last week?

THE WITNESS: No.

THE COURT: Last month?

THE WITNESS: I haven't talked to Nancy about this for quite some time. You know, we kicked it around, and we didn't come to any conclusion.

Q (By Mr. Marcus) Do you have the money to pay it?

A Of course not. We don't have $30,000.

Q How much do you have?

A We don't have any -- I don't know of any kind of sizable amount of money we have. I am not involved in the financial structure of this organization.

Q Do you know who paysthe rent for the space in Brooklyn that the Party occupies?

THE COURT: I think we have already gone over that.

A. You will have to ask the people in New York.

MR. MARCUS: Witness with you.

MR. MITCHELL: No questions.

THE COURT: Okay, the Supplementary Proceedings are concluded.

(Thereupon, at 4:15 o'clock p.m., the above-captioned Supplementary Proceedings were concluded.)

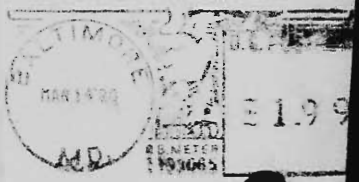
I hereby certify that the foregoing transcript is a true and accurate record of the proceedings in the above-captioned matter.

Paul K. Riggleman, Notary Public

---

3 3 0 4 0 3 7 2 1 3

COURT OF COMMON PLEAS OF BALTIMORE CITY
Room 412
Civil Courts Building
Fayette & Calvert Streets
Baltimore, Maryland. 21202



OFFICE OF GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marsha G. Gentner

MUR 1158

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1980

Frank Sherry
Legal Department
Clerk, Court of Common Pleas
Civil Courts Building
Fayette and Calvert Streets
Baltimore, Md. 21202

Dear Mr. Sherry:

As per our telephone conversation of March 5, 1980, please find enclosed a check for $41.50 to cover the costs of photocopying of the transcript of Supplemental Proceeding before Commissioner Paul Reed, Jr. in Whitman v. U.S. Labor Party, 1975/387/18960. Please send the transcript, as soon as possible, to me at the following address:

Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Thank you for your attention to this matter.

Sincerely,

Marsha G. Gentner

Marsha G. Gentner

3 0 1 0 3 7 - 3

GCM 698



maryland national bank

BALTIMORE, MARYLAND 21203

March 11, 1980

6681

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1158

Dear Mr. Steele:

In response to the order issued by the Commission with regard to the above matter, I am enclosing the Written Questions under Order (and answers) which I have executed on behalf of the Bank. Please let me know if you require anything additional.

Sincerely yours,

George B. P. Ward, Jr.
Vice President
301-244-6784

GBPW:mvt

Encls.

WRITTEN QUESTIONS UNDER ORDER

To: Maryland National Bank
Re: MUR 1158

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and have an affidavit signed by the appropriate bank official and notarized.

You are required to submit your answers within ten (10) days of your receipt of these questions.

You are hereby advised of the provisions of 2 U.S.C. § 437g(a)(12) which prohibits anyone from making public any Commission investigation and provides for a fine up to $5,000 for a violation of that provision.

Please set forth your answers in the spaces provided below each question and return this original with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

Considering the possible application of the Right to Financial Privacy Act of 1978, please do not attach any bank records to your answers or provide any information not requested by the questions.

For the purposes of these written questions, the term "cashier's check" refers to a cashier's check issued by Maryland National Bank, Post Office Box 987, Baltimore, Maryland 21203, bearing the notation "[illegible] near the upper right hand corner, also bearing the notation "[illegible]" in the upper right hand corner, and also bearing the following series of numbers accross the bottom: "[illegible]

For the purposes of these written questions, the term "Maryland National Bank customer" is defined as any person in whose name an account is maintained in the Maryland National Bank.

1. Did Maryland National Bank issue the cashier's check at the request of any Maryland National Bank customer?

Yes.

2. If your answer to Question 1 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

Debra J. Hanania, 4004 Linkwood Road, Baltimore, Md. 21210
Savings account
Checking account

3. If your answer to Question 1 is in the negative, please state the name of the person who requested the issuance of the cashier's check.

Not applicable

4. Was the cashier's check issued as a means of withdrawing funds then on deposit in any account of any Maryland National Bank customer?

Yes

5. If your answer to Question 4 is in the affirmative, please state the name and address of such customer and the number of and type of the account from which the withdrawal was made.

Debra J. Hanania, 4004 Linkwood Road, Baltimore, Md. 21210
Savings account

6. If your answer to Question 4 is in the negative, was the cashier's check issued in consideration of the physical transfer of cash or of a negotiable instrument or instruments from a Maryland National Bank customer to the Maryland National Bank?

Not applicable

7. If your answer to Question 6 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

Not applicable

8. If your answers to Questions 1, 4, and 6 are all in the negative, please set forth all of the facts and circumstances surrounding the issuance of the cashier's check.

Not applicable

9. Was the cashier's check directly transferred from your physical possession to the physical possession of any Maryland National Bank customer?

Yes

10. If your answer to Question 9 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

Same as #2 above

11. If your answer to Question 9 is in the negative, please state the name of the person into whose physical possession you transferred the cashier's check.

Not applicable

12. Please set forth the names of every employee or agent of the Maryland National Bank who has personal knowledge of any of the facts set forth in your answers, excluding any persons whose knowledge is based solely upon examination of documents.

Information necessary to respond was obtained from documentation in possession of the Bank.

A F F I D A V I T

I, the undersigned, George B. P. Ward, Jr., Vice President of Maryland National Bank, hereby make oath in due form of law that the matters and facts set forth herein are true and correct to the best of my information, knowledge and belief.

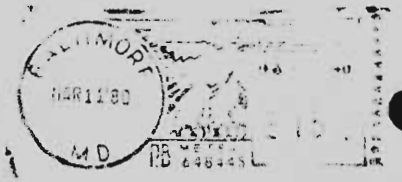
George B. P. Ward, Jr.

Subscribed and sworn to
this 11th day of March, 1980.

Notary Public

My Commission Expires: 7-1-82

maryland national
bank
P.O. BOX 987
BALTIMORE, MARYLAND 21203



Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 6, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Re: MUR 1158

Dear Mr. Ward:

I am enclosing a set of written questions, an Order of the Commission, and a Certificate of Compliance with the Right to Financial Privacy Act of 1978, all directed to Maryland National Bank. It is my understanding that you are the legal counsel for the bank and these materials have therefore been mailed to you for answers on its behalf.

I would like to remind you of the provisions of 2 U.S.C. § 437g(a)(12) which prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made You are advised that no such consent has been given in this case.

If you have any questions, please call Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ... ¢
- ☐ Show to whom, date, and address of delivery ... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $
- (CONSULT POSTMASTER FOR FEES)

FEDERAL ELECTION COMMISSION
'80 MAR 13 AM 11:34

2. ARTICLE ADDRESSED TO:

George B.P. Ward, Esq.
Naryland National Bank

3. ARTICLE DESCRIPTION:

REGISTERED NO	CERTIFIED NO.	INSURED NO.
	94433	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY MAR 10 1980

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO: 1978-272-382

MUR 1158 (Smith)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

From: Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1158

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the enclosed Written Questions Under Order, answers to which are being ordered pursuant to 12 U.S.C. § 3413(a) and (g). I further certify that good faith reliance upon this certificate relieves your institution and its employees and agents of any possible liability to the customer in connection with the disclosure of this information.

6 March 1980
Date

Charles N. Steele
General Counsel

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Re: MUR 1158

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on March 4, 1980.

Robert O. Tiernan
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

WRITTEN QUESTIONS UNDER ORDER

To: Maryland National Bank
Re: MUR 1158

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and have an affidavit signed by the appropriate bank official and notarized.

You are required to submit your answers within ten (10) days of your receipt of these questions.

You are hereby advised of the provisions of 2 U.S.C. § 437g(a)(12) which prohibits anyone from making public any Commission investigation and provides for a fine up to $5,000 for a violation of that provision.

Please set forth your answers in the spaces provided below each question and return this original with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

Considering the possible application of the Right to Financial Privacy Act of 1978, please do not attach any bank records to your answers or provide any information not requested by the questions.

For the purposes of these written questions, the term "cashier's check" refers to a cashier's check issued by Maryland National Bank, Post Office Box 987, Baltimore, Maryland 21203, bearing the notation " " near the upper right hand corner, also bearing the notation " " in the upper right hand corner, and also bearing the following series of numbers accross the bottom: "

For the purposes of these written questions, the term "Maryland National Bank customer" is defined as any person in whose name an account is maintained in the Maryland National Bank.

1. Did Maryland National Bank issue the cashier's check at the request of any Maryland National Bank customer?

2. If your answer to Question 1 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

3. If your answer to Question 1 is in the negative, please state the name of the person who requested the issuance of the cashier's check.

4. Was the cashier's check issued as a means of withdrawing funds then on deposit in any account of any Maryland National Bank customer?

5. If your answer to Question 4 is in the affirmative, please state the name and address of such customer and the number of and type of the account from which the withdrawal was made.

6. If your answer to Question 4 is in the negative, was the cashier's check issued in consideration of the physical transfer of cash or of a negotiable instrument or instruments from a Maryland National Bank customer to the Maryland National Bank?

7. If your answer to Question 6 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

8. If your answers to Questions 1, 4, and 6 are all in the negative, please set forth all of the facts and circumstances surrounding the issuance of the cashier's check.

9. Was the cashier's check directly transferred from your physical possession to the physical possession of any Maryland National Bank customer?

10. If your answer to Question 9 is in the affirmative, please state the name and address of such customer and the account numbers of all accounts maintained in such customer's name together with a description of the type of each such account.

11. If your answer to Question 9 is in the negative, please state the name of the person into whose physical possession you transferred the cashier's check.

12. Please set forth the names of every employee or agent of the Maryland National Bank who has personal knowledge of any of the facts set forth in your answers, excluding any persons whose knowledge is based solely upon examination of documents.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Re: MUR 1158

Dear Mr. Ward:

I am enclosing a set of written questions, an Order of the Commission, and a Certificate of Compliance with the Right to Financial Privacy Act of 1978, all directed to Maryland National Bank. It is my understanding that you are the legal counsel for the bank and these materials have therefore been mailed to you for answers on its behalf.

I would like to remind you of the provisions of 2 U.S.C. § 437g(a)(12) which prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made You are advised that no such consent has been given in this case.

If you have any questions, please call Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

KHS

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: MARCH 4, 1980

SUBJECT: ORDER IN RELATION TO MUR 1158

The attached order, approved on March 3, 1979 by a vote of 5-0, has been signed and sealed this date.

ATTACHMENT:
Order - Maryland National Bank

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1158
Debra J. Hanania	)	
a.k.a. Debra Hanania Freeman	)	
a.k.a. Debra Hanania	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 3, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1158:

1. Authorize the Order to Maryland National Bank as attached to the Memorandum to the Commission undated.

2. Authorize the General Counsel to send the letter and Certification of Compliance as attached to the above-named memorandum.

Voting for this determination were Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan.

Attest:

3/3/80
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-27-80, 4:18
Circulated on 48 hour vote basis: 2-28-80, 11:00

February 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Jane Colgrove

SUBJECT: MUR 1158

Please have the attached Memo to the Commission on MUR 1158 distributed to the Commission on a 48 hour tally basis.

Thank you.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Authorization to Issue Order in Connection with MUR 1158(80)

Attached for Commission approval are an Order and Written Questions directed to Maryland National Bank in furtherance of our investigation of the above matter.

The questions are very carefully drafted to come within 12 U.S.C. § 3413(a) and (g) which are exceptions to the notice requirements of the Right to Financial Privacy Act of 1978. 1/ The answers will assist us in preparation for the depositions of Harold H. Harrison and Debra J. Hanania, as well as to gain evidence concerning the source of the money used to purchase the subject cashier's check.

We will soon be circulating a subpoena for the testimony of and production of records by the bank's legal officer who has agreed to provide all relevant records and to explain their significance provided we follow the proper procedures under the Right to Financial Privacy Act of 1978. Such a subpoena will require advance notice to Debra J. Hanania who will have the right to contest the production of her bank records by filing a motion in district court. Since that procedure may well prevent us from obtaining all of the relevant evidence from the bank until after we would otherwise depose Harrison and Hanania, we have decided to start with these written questions so that we are assured of having the basic facts about the cashier's check as soon as possible and without procedural delays.

RECOMMENDATIONS

1. Authorize the attached Order to Maryland National Bank.

2. Authorize the General Counsel to send the attached letter and Certification of Compliance.

Attachments
1. Right to Fiancial Privacy Act of 1978
2. Order (1)
3. Letter (1)
4. Certification of Compliance (1)
5. Authorization Form

1/ See Attachment 1 to Memorandum.

CHAPTER 35—RIGHT TO FINANCIAL PRIVACY [NEW]

Sec.
3401. Definitions.
3402. Access to financial records by Government authorities prohibited; exceptions.
3403. Confidentiality of financial records.
(a) Release of records by financial institutions prohibited.
(b) Release of records upon certification of compliance with chapter.
(c) Notification to Government authority of existence of relevant information in records.
(d) Release of records as incident to perfection of security interest, proving a claim in bankruptcy, collecting a debt, or processing an application with regard to a Government loan, loan guarantee, etc.
3404. Customer authorizations.
(a) Statement furnished by customer to financial institution and Government authority; contents.
(b) Authorization as condition of doing business prohibited.
(c) Right of customer to access to financial institution's record of disclosures.
(d) Notification of rights to customer; preparation of statement of customers' rights; compliance.
3405. Administrative subpena and summons.
3406. Search warrants.
(a) Applicability of Federal Rules of Criminal Procedure.
(b) Mailing of copy and notice to customer.
(c) Court-ordered delays in mailing.
3407. Judicial subpena.
3408. Formal written request.
3409. Delayed notice.
(a) Application by Government authority; findings.
(b) Grant of delay order; duration and specifications; extensions; copy of request and notice to customer.
(c) Notice requirement respecting emergency access to financial records.
(d) Preservation of memorandums, affidavits, or other papers.
3410. Customer challenges.
(a) Filing of motion to quash or application to enjoin; proper court; contents.
(b) Filing of response; additional proceedings.
(c) Decision of court.
(d) Appeals.
(e) Sole judicial remedy available to customer.
(f) Affect on challenges by financial institutions.
3411. Duty of financial institutions.
3412. Use of information.
(a) Transfer of financial records to other agencies or departments; certification.
(b) Mailing of copy of certification and notice to customer.
(c) Court-ordered delays in mailing.
(d) Exchanges of examination reports by supervisory agencies; transfer of financial records to defend customer action; withholding of information.
3413. Exceptions.
(a) Disclosure of financial records not identified with particular customers.
(b) Disclosure pursuant to exercise of supervisory, regulatory, or monetary functions of financial institutions.
(c) Disclosure pursuant to Internal Revenue Code.
(d) Disclosure pursuant to Federal statute or rule promulgated thereunder.
(e) Disclosure pursuant to Federal Rules of Criminal Procedure or comparable rules of other courts.
(f) Disclosure pursuant to administrative subpena issued by administrative law judge.
(g) Disclosure pursuant to legitimate law enforcement inquiry respecting name, address, account number, and type of account of particular customers.
(h) Disclosure pursuant to lawful proceeding, investigation, etc., directed at financial institution or legal entity or consideration or administration respecting Government loans, loan guarantees, etc.
(i) Disclosure pursuant to issuance of subpena or court order respecting grand jury proceeding.
(j) Disclosure pursuant to proceeding, investigation, etc., instituted by General Accounting Office and directed at a government authority.
3414. Special procedures.
3415. Cost reimbursement.
3416. Jurisdiction.
3417. Civil penalties.
(a) Liability of agencies or departments of United States or financial institutions.
(b) Disciplinary action for willful or intentional violation of chapter by agents or employees of department or agency.
(c) Good faith defense.
(d) Exclusive judicial remedies and sanctions.
3418. Injunctive relief.
3419. Suspension of limitations.
3420. Grand jury information.
3421. Reporting requirements.
3422. Applicability to Securities and Exchange Commission.

§ 3401. Definitions

For the purpose of this chapter the term—

(1) "financial institution" means any office of a bank, savings bank, card issuer as defined in section 1602(n) of Title 15, industrial

loan company, trust company, savings and loan, build or homestead association (including cooperative banks) or consumer finance institution, located in any State or t United States, the District of Columbia, Puerto Rico, can Samoa, or the Virgin Islands;

(2) "financial record" means an original of, a cop mation known to have been derived from, any reco financial institution pertaining to a customer's rela the financial institution;

(3) "Government authority" means any agency or the United States, or any officer, employee, or agent t

(4) "person" means an individual or a partnersh fewer individuals;

(5) "customer" means any person or authorized of that person who utilized or is utilizing any service institution, or for whom a financial institution is actin as a fiduciary, in relation to an account maintained i name;

(6) "supervisory agency" means, with respect to financial institution any of the following which has sta ty to examine the financial condition or business oper institution—

(A) the Federal Deposit Insurance Corporatio
(B) the Federal Savings and Loan Insurance
(C) the Federal Home Loan Bank Board;
(D) the National Credit Union Administration;
(E) the Board of Governors of the Federal R
(F) the Comptroller of the Currency;
(G) the Securities and Exchange Commission;
(H) the Secretary of the Treasury, with respe Secrecy Act and the Currency and Foreign Trans ing Act (Public Law 91-508, title I and II); or
(I) any State banking or securities departm and

(7) "law enforcement inquiry" means a lawful i official proceeding inquiring into a violation of, or fai with, any criminal or civil statute or any regulation, issued pursuant thereto.

Pub.L. 95-630, Title XI, § 1101, Nov. 10, 1978, 92 Stat. 36

References in Text. The Bank Secrecy Act, referred to in par. (6)(H), probably means Title I of Pub.L. 91-508, Oct. 26, 1970, 84 Stat. 1114, which enacted chapter 21 and sections 1829b and 1730d of this title.

The Currency and Foreign Transactions Reporting Act, referred to in par. (6)(H), is Title II of Pub.L. 91-508, Oct. 26, 1970, 84 Stat. 1118, which is classified to section 1051 et seq. of this title.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of out as a note under se title.

Short Title. Section 1 630 provided that: "Thi acted this chapter] may 'Right to Financial Priv

Legislative History. history and purpose of 1978 U.S.Code Cong. a 9273.

§ 3402. Access to financial records by Government a hibited; exceptions

Except as provided by section 3403(c) or (d), 3413, title, no Government authority may have access to or o or the information contained in the financial records o from a financial institution unless the financial records ar scribed and—

(1) such customer has authorized such disclosur with section 3404 of this title;

'O FINANCIAL PRIVACY [NEW]

Sec.
(b) Mailing of copy of certification and notice to customer.
(c) Court-ordered delays in mailing.
(d) Exchanges of examination reports by supervisory agencies; transfer of financial records to defend customer action; withholding of information.
3413. Exceptions.
(a) Disclosure of financial records not identified with particular customers.
(b) Disclosure pursuant to exercise of supervisory, regulatory, or monetary functions of financial institutions.
(c) Disclosure pursuant to Internal Revenue Code.
(d) Disclosure pursuant to Federal statute or rule promulgated thereunder.
(e) Disclosure pursuant to Federal Rules of Criminal Procedure or comparable rules of other courts.
(f) Disclosure pursuant to administrative subpena issued by administrative law judge.
(g) Disclosure pursuant to legitimate law enforcement inquiry respecting name, address, account number, and type of account of particular customers.
(h) Disclosure pursuant to lawful proceeding, investigation, etc., directed at financial institution or legal entity or consideration or administration respecting Government loans, loan guarantees, etc.
(i) Disclosure pursuant to issuance of subpena or court order respecting grand jury proceeding.
(j) Disclosure pursuant to proceeding, investigation, etc., instituted by General Accounting Office and directed at a government authority.
3414. Special procedures.
3415. Cost reimbursement.
3416. Jurisdiction.
3417. Civil penalties.
(a) Liability of agencies or departments of United States or financial institutions.
(b) Disciplinary action for willful or intentional violation of chapter by agents or employees of department or agency.
(c) Good faith defense.
(d) Exclusive judicial remedies and sanctions.
3418. Injunctive relief.
3419. Suspension of limitations.
3420. Grand jury information.
3421. Reporting requirements.
3422. Applicability to Securities and Exchange Commission.

the term—
means any office of a bank, savings
section 1602(n) of Title 15, industrial

loan company, trust company, savings and loan, building and loan, or homestead association (including cooperative banks), credit union, or consumer finance institution, located in any State or territory of the United States, the District of Columbia, Puerto Rico, Guam, American Samoa, or the Virgin Islands;

(2) "financial record" means an original of, a copy of, or information known to have been derived from, any record held by a financial institution pertaining to a customer's relationship with the financial institution;

(3) "Government authority" means any agency or department of the United States, or any officer, employee, or agent thereof;

(4) "person" means an individual or a partnership of five or fewer individuals;

(5) "customer" means any person or authorized representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name;

(6) "supervisory agency" means, with respect to any particular financial institution any of the following which has statutory authority to examine the financial condition or business operations of that institution—

(A) the Federal Deposit Insurance Corporation;
(B) the Federal Savings and Loan Insurance Corporation;
(C) the Federal Home Loan Bank Board;
(D) the National Credit Union Administration;
(E) the Board of Governors of the Federal Reserve System;
(F) the Comptroller of the Currency;
(G) the Securities and Exchange Commission;
(H) the Secretary of the Treasury, with respect to the Bank Secrecy Act and the Currency and Foreign Transactions Reporting Act (Public Law 91–508, title I and II); or
(I) any State banking or securities department or agency; and

(7) "law enforcement inquiry" means a lawful investigation or official proceeding inquiring into a violation of, or failure to comply with, any criminal or civil statute or any regulation, rule, or order issued pursuant thereto.

Pub.L. 95–630, Title XI, § 1101, Nov. 10, 1978, 92 Stat. 3697.

References in Text. The Bank Secrecy Act, referred to in par. (6)(H), probably means Title I of Pub.L. 91–508, Oct. 26, 1970, 84 Stat. 1114, which enacted chapter 21 and sections 1829b and 1730d of this title.

The Currency and Foreign Transactions Reporting Act, referred to in par. (6)(H), is Title II of Pub.L. 91–508, Oct. 26, 1970, 84 Stat. 1118, which is classified to section 1051 et seq. of this title.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Short Title. Section 1100 of Pub.L. 95–630 provided that: "This title [which enacted this chapter] may be cited as the 'Right to Financial Privacy Act of 1978'."

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3402. Access to financial records by Government authorities prohibited; exceptions

Except as provided by section 3403(c) or (d), 3413, or 3414 of this title, no Government authority may have access to or obtain copies of, or the information contained in the financial records of any customer from a financial institution unless the financial records are reasonably described and—

(1) such customer has authorized such disclosure in accordance with section 3404 of this title;

(2) such financial records are disclosed in response to an administrative subpena or summons which meets the requirements of section 3405 of this title;

(3) such financial records are disclosed in response to a search warrant which meets the requirements of section 3406 of this title;

(4) such financial records are disclosed in response to a judicial subpena which meets the requirements of section 3407 of this title; or

(5) such financial records are disclosed in response to a formal written request which meets the requirements of section 3408 of this title.

Pub.L. 95–630, Title XI, § 1102, Nov. 10, 1978, 92 Stat. 3697.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3403. Confidentiality of financial records—Release of records by financial institutions prohibited

(a) No financial institution, or officer, employees, or agent of a financial institution, may provide to any Government authority access to or copies of, or the information contained in, the financial records of any customer except in accordance with the provisions of this chapter.

Release of records upon certification of compliance with chapter

(b) A financial institution shall not release the financial records of a customer until the Government authority seeking such records certifies in writing to the financial institution that it has complied with the applicable provisions of this chapter.

Notification to Government authority of existence of relevant information in records

(c) Nothing in this chapter shall preclude any financial institution, or any officer, employee, or agent of a financial institution, from notifying a Government authority that such institution, or officer, employee, or agent has information which may be relevant to a possible violation of any statute or regulation.

Release of records as incident to perfection of security interest, proving a claim in bankruptcy, collecting a debt, or processing an application with regard to a Government loan, loan guarantee, etc.

(d)(1) Nothing in this chapter shall preclude a financial institution, as an incident to perfecting a security interest, proving a claim in bankruptcy, or otherwise collecting on a debt owing either to the financial institution itself or in its role as a fiduciary, from providing copies of any financial record to any court or Government authority.

(2) Nothing in this chapter shall preclude a financial institution, as an incident to processing an application for assistance to a customer in the form of a Government loan, loan guaranty, or loan insurance agreement, or as an incident to processing a default on, or administering, a Government guaranteed or insured loan, from initiating contact with an appropriate Government authority for the purpose of providing any financial record necessary to permit such authority to carry out its responsibilities under a loan, loan guaranty, or loan insurance agreement.
Pub.L. 95–630, Title XI, § 1103, Nov. 10, 1978, 92 Stat. 3698.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3404. Customer authorizations—Statement furnished by customer to financial institution and Government authority; contents

(a) A customer may authorize disclosure under section 3402(1) of this title if he furnishes to the financial institution and to the Govern-

ment authority seeking to obtain suc
ment which—

(1) authorizes such disclosu
months;

(2) states that the custom
any time before the financial re

(3) identifies the financial
disclosed;

(4) specifies the purposes fo
ty to which, such records may

(5) states the customer's ri

Authorization as condition

(b) No such authorization shall
business with any financial institut

Right of customer to acc record of

(c) The customer has the right,
tains a court order as provided in
copy of the record which the fin
stances in which the customer's
authority pursuant to this section,
ment authority to which such disclo

Notification of rights to cust of customers'

(d) All financial institutions sh
mers of their rights under this ch
Federal Reserve System shall pre
under this chapter. Any financial
a statement of customers' rights p
to be in compliance with this subsec
Pub.L. 95–630, Title XI, § 1104,

Effective Date. Section effective upo
the expiration of 120 days after Nov. 1
1978, see section 2101 of Pub.L. 95–630, s
out as a note under section 375b of th
title.

§ 3405. Administrative subpen

A Government authority may
3402(2) of this title pursuant to
otherwise authorized by law only

(1) there is reason to bel
vant to a legitimate law enfor

(2) a copy of the subpena
customer or mailed to his la
on which the subpena or
institution together with the
reasonable specificity the nat

"Records or information c
financial institution named i
being sought by this (agency
Right to Financial Privacy
If you desire that such recor
you must:

"1. Fill out the a
statement or write one
customer whose record
ment and either giving
are not relevant to the l
in this notice or any
release of the records.

ment authority seeking to obtain such disclosure a signed and dated statement which—

(1) authorizes such disclosure for a period not in excess of three months;

(2) states that the customer may revoke such authorization at any time before the financial records are disclosed;

(3) identifies the financial records which are authorized to be disclosed;

(4) specifies the purposes for which, and the Government authority to which, such records may be disclosed; and

(5) states the customer's rights under this chapter.

Authorization as condition of doing business prohibited

(b) No such authorization shall be required as a condition of doing business with any financial institution.

Right of customer to access to financial institution's record of disclosures

(c) The customer has the right, unless the Government authority obtains a court order as provided in section 3409 of this title, to obtain a copy of the record which the financial institution shall keep of all instances in which the customer's record is disclosed to a Government authority pursuant to this section, including the identity of the Government authority to which such disclosure is made.

Notification of rights to customer; preparation of statement of customers' rights; compliance

(d) All financial institutions shall promptly notify all of their customers of their rights under this chapter. The Board of Governors of the Federal Reserve System shall prepare a statement of customers' rights under this chapter. Any financial institution that provides its customers a statement of customers' rights prepared by the Board shall be deemed to be in compliance with this subsection.

Pub.L. 95–630, Title XI, § 1104, Nov. 10, 1978, 92 Stat. 3698.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3405. Administrative subpena and summons

A Government authority may obtain financial records under section 3402(2) of this title pursuant to an administrative subpena or summons otherwise authorized by law only if—

(1) there is reason to believe that the records sought are relevant to a legitimate law enforcement inquiry;

(2) a copy of the subpena or summons has been served upon the customer or mailed to his last known address on or before the date on which the subpena or summons was served on the financial institution together with the following notice which shall state with reasonable specificity the nature of the law enforcement inquiry:

"Records or information concerning your transactions held by the financial institution named in the attached subpena or summons are being sought by this (agency or department) in accordance with the Right to Financial Privacy Act of 1978 for the following purpose: If you desire that such records or information not be made available, you must:

"1. Fill out the accompanying motion paper and sworn statement or write one of your own, stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

"2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts:

"3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to

"4. Be prepared to come to court and present your position in further detail.

"5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer."; and

(3) ten days have expired from the date of service of the notice or fourteen days have expired from the date of mailing the notice to the customer and within such time period the customer has not filed a sworn statement and motion to quash in an appropriate court, or the customer challenge provisions of section 3410 of this title have been complied with.

Pub.L. 95–630, Title XI, § 1105, Nov. 10, 1978, 92 Stat. 3699.

References in Text. The Right to Financial Privacy Act of 1978, referred to in par. (2), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3406. Search warrants—Applicability of Federal Rules of Criminal Procedure

(a) A Government authority may obtain financial records under section 3402(3) of this title only if it obtains a search warrant pursuant to the Federal Rules of Criminal Procedure.

Mailing of copy and notice to customer

(b) No later than ninety days after the Government authority serves the search warrant, it shall mail to the customer's last known address a copy of the search warrant together with the following notice:

"Records or information concerning your transactions held by the financial institution named in the attached search warrant were obtained by this (agency or department) on (date) for the following purpose: . You may have rights under the Right to Financial Privacy Act of 1978.".

Court-ordered delays in mailing

(c) Upon application of the Government authority, a court may grant a delay in the mailing of the notice required in subsection (b) of this section, which delay shall not exceed one hundred and eighty days following the service of the warrant, if the court makes the findings required in section 3409(a) of this title. If the court so finds, it shall enter an ex parte order granting the requested delay and an order prohibiting the financial institution from disclosing that records have been obtained or that a search warrant for such records has been executed. Additional delays of up to ninety days may be granted by the court upon application, but only in accordance with this subsection. Upon expiration of the period of delay of notification of the customer, the following notice shall be mailed to the customer along with a copy of the search warrant:

"Records or information concerning your transactions held by the financial institution named in the attached search warrant were obtained by this (agency or department) on (date). Notification was delayed beyond the statutory ninety-day delay period pursuant to a determination

by the court that such notice wou
concerning . You may ha
Privacy Act of 1978.".

Pub.L. 95–630, Title XI, § 1106, No

References in Text. The Federal Rul
of Criminal Procedure, referred to
subsec. (a), are set out in Title 18, Crim
and Criminal Procedure.
The Right to Financial Privacy Act
1978, referred to in text, is classified
this chapter.

Effective Date. Section effective up
the expiration of 120 days after Nov.

§ 3407. Judicial subpena

A Government authority may
3402(4) of this title pursuant to j

(1) such subpena is auth
believe that the records soug
forcement inquiry;

(2) a copy of the subpen
or mailed to his last known
the subpena was served on
the following notice which
the nature of the law enforcer

"Records or information
held by the financial institu
being sought by this (agency
ance with the Right to Finan
ing purpose: If you desire
made available, you must:

"1. Fill out the a
statement or write one
customer whose record
ment and either giving
are not relevant to t
stated in this notice o
the release of the record

"2. File the motion
them to the clerk of the

"3. Serve the Gove
by mailing or deliverin
to .

"4. Be prepared to
in further detail.

"5. You do not ne
wish to employ one to

If you do not follow the abo
days from the date of ser
mailing of this notice, the
will be made available. T
government authorities for
which event you will be notif

(3) ten days have expir
days from the date of ma
within such time period th
ment and motion to quash
challenge provisions of sect
with.

Pub.L. 95–630, Title XI, § 1107,

References in Text. The Right t
nancial Privacy Act of 1978, referre
in par. (2), is classified to this cha

Effective Date. Section effective
the expiration of 120 days after No
1978, see section 2101 of Pub.L. 95-63

n and statement by mailing or delivering
any one of the following United States

rnment authority requesting the records
g a copy of your motion and statement to
come to court and present your position

ed to have a lawyer, although you may
represent you and protect your rights.
bove procedures, upon the expiration of
service or fourteen days from the date
the records or information requested
able. These records may be transferred
orities for legitimate law enforcement
ou will be notified after the transfer.";

d from the date of service of the notice
ed from the date of mailing the notice
such time period the customer has not
motion to quash in an appropriate court,
provisions of section 3410 of this title

Nov. 10, 1978, 92 Stat. 3699.

Fi- out as a note under section 375b of this
to title.
er. **Legislative History.** For legislative
on history and purpose of Pub.L. 95-630, see
10, 1978 U.S.Code Cong. and Adm.News, p.
set 9273.

plicability of Federal Rules of Criminal

y obtain financial records under section
tains a search warrant pursuant to the
re.

nd notice to customer

after the Government authority serves
o the customer's last known address a
with the following notice:
ning your transactions held by the fi-
ttached search warrant were obtained
on (date) for the following purpose:
ier the Right to Financial Privacy Act

delays in mailing

ernment authority, a court may grant
ice required in subsection (b) of this
ed one hundred and eighty days fol-
the court makes the findings required
f the court so finds, it shall enter an
ed delay and an order prohibiting the
that records have been obtained or
cords has been executed. Additional
granted by the court upon application,
subsection. Upon expiration of the
e customer, the following notice shall
h a copy of the search warrant:

ing your transactions held by the fi-
tached search warrant were obtained
n (date). Notification was delayed
y period pursuant to a determination

by the court that such notice would seriously jeopardize an investigation concerning . You may have rights under the Right to Financial Privacy Act of 1978.".

Pub.L. 95-630, Title XI, § 1106, Nov. 10, 1978, 92 Stat. 3700.

References in Text. The Federal Rules of Criminal Procedure, referred to in subsec. (a), are set out in Title 18, Crimes and Criminal Procedure.

The Right to Financial Privacy Act of 1978, referred to in text, is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3407. Judicial subpena

A Government authority may obtain financial records under section 3402(4) of this title pursuant to judicial subpena only if—

(1) such subpena is authorized by law and there is reason to believe that the records sought are relevant to a legitimate law enforcement inquiry;

(2) a copy of the subpena has been served upon the customer or mailed to his last known address on or before the date on which the subpena was served on the financial institution together with the following notice which shall state with reasonable specificity the nature of the law enforcement inquiry:

"Records or information concerning your transactions which are held by the financial institution named in the attached subpena are being sought by this (agency or department or authority) in accordance with the Right to Financial Privacy Act of 1978 for the following purpose: If you desire that such records or information not be made available, you must:

"1. Fill out the accompanying motion paper and sworn statement or write one of your own, stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

"2. File the motion and statement by mailing or delivering them to the clerk of the Court.

"3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to .

"4. Be prepared to come to court and present your position in further detail.

"5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer;" and

(3) ten days have expired from the date of service or fourteen days from the date of mailing of the notice to the customer and within such time period the customer has not filed a sworn statement and motion to quash in an appropriate court, or the customer challenge provisions of section 3410 of this title have been complied with.

Pub.L. 95-630, Title XI, § 1107, Nov. 10, 1978, 92 Stat. 3700.

References in Text. The Right to Financial Privacy Act of 1978, referred to in par. (2), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3408. Formal written request

A Government authority may request financial records under section 3402(5) of this title pursuant to a formal written request only if—

(1) no administrative summons or subpena authority reasonably appears to be available to that Government authority to obtain financial records for the purpose for which such records are sought;

(2) the request is authorized by regulations promulgated by the head of the agency or department;

(3) there is reason to believe that the records sought are relevant to a legitimate law enforcement inquiry; and

(4)(A) a copy of the request has been served upon the customer or mailed to his last known address on or before the date on which the request was made to the financial institution together with the following notice which shall state with reasonable specificity the nature of the law enforcement inquiry:

"Records or information concerning your transactions held by the financial institution named in the attached request are being sought by this (agency or department) in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

"If you desire that such records or information not be made available, you must:

"1. Fill out the accompanying motion paper and sworn statement or write one of your own, stating that you are the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

"2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States District Courts:

"3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to

"4. Be prepared to come to court and present your position in further detail.

"5. You do not need to have a lawyer, although you may wish to employ one to represent you and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein may be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer;" and

(B) ten days have expired from the date of service or fourteen days from the date of mailing of the notice by the customer and within such time period the customer has not filed a sworn statement and an application to enjoin the Government authority in an appropriate court, or the customer challenge provisions of section 3410 of this title have been complied with.

Pub.L. 95–630, Title XI, § 1108, Nov. 10, 1978, 92 Stat. 3701.

References in Text. The Right to Financial Privacy Act of 1978, referred to in par. (4), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3409. Delayed notice—Application by Government authority; findings

(a) Upon application of the Government authority, the customer notice required under section 3404(c), 3405(2), 3406(c), 3407(2), 3408(4), or

3412(b) of this title may be delaye
the presiding judge or magistrate fin
(1) the investigation being
diction of the Government aut
(2) there is reason to belie
relevant to a legitimate law enfo
(3) there is reason to believ
(A) endangering life o
(B) flight from prosecu
(C) destruction of or ta
(D) intimidation of pot
(E) otherwise seriously
ficial proceeding or undu
proceeding to the same e
ceeding 1 subparagraphs.

An application for delay must be m

Grant of delay order; duratio copy of request a

(b)(1) If the court makes the
(2), and (3) of subsection (a) of
order granting the requested delay
and an order prohibiting the fin
records have been obtained or tha
except that, if the records have b
exercising financial controls over
under section 5(b) of the Trading
Emergency Economic Powers Act
Participation Act, and the court fi
such notice may endanger the liv
group of customers, or any perso
a customer, the court may specify t

(2) Extensions of the delay of
to ninety days each may be gran
only in accordance with this subsec

(3) Upon expiration of the per
graph (1) or (2), the customer s
the process or request together
state with reasonable specificity
quiry:

"Records or information conce
by the financial institution named
supplied to or requested by the
process or request on (date).
determination by the (title of
Financial Privacy Act of 1978

The purpose of
was ."

Notice requirement respecting

(c) When access to financial
3414(b) of this title (emergency
unless a court has authorized de
and (b) of this section, as soo
obtained serve upon the custome
to his last known address, a cop
tion together with the following
specificity the nature of the law e

"Records concerning your tra
named in the attached request w

est

request financial records under section
a formal written request only if—
mmons or subpena authority reasonably
that Government authority to obtain fi-
pose for which such records are sought;
rized by regulations promulgated by the
ment;
elieve that the records sought are rele-
rcement inquiry; and
uest has been served upon the customer
address on or before the date on which
e financial institution together with the
ll state with reasonable specificity the
t inquiry:
concerning your transactions held by the
in the attached request are being sought
nent) in accordance with the Right to
for the following purpose:
ecords or information not be made avail-

ccompanying motion paper and sworn
of your own, stating that you are the
s are being requested by the Govern-
the reasons you believe that the records
e legitimate law enforcement inquiry
any other legal basis for objecting to
s.
and statement by mailing or delivering
ny one of the following United States

nment authority requesting the records
g a copy of your motion and statement

ome to court and present your position

l to have a lawyer, although you may
present you and protect your rights.
bove procedures, upon the expiration
service or fourteen days from the date
records or information requested there-
These records may be transferred to
s for legitimate law enforcement in-
ill be notified after the transfer;" and
l from the date of service or fourteen
ng of the notice by the customer and
customer has not filed a sworn state-
enjoin the Government authority in an
stomer challenge provisions of section
nplied with.

ov. 10, 1978, 92 Stat. 3701.

n- out as a note under section 375b of this
n title.

Legislative History. For legislative
n history and purpose of Pub.L. 95-630, see
9, 1978 U.S.Code Cong. and Adm.News, p.
t 9273.

ation by Government authority; find-

ernment authority, the customer notice
05(2), 3406(c), 3407(2), 3408(4), or

3412(b) of this title may be delayed by order of an appropriate court if the presiding judge or magistrate finds that—

(1) the investigation being conducted is within the lawful jurisdiction of the Government authority seeking the financial records;

(2) there is reason to believe that the records being sought are relevant to a legitimate law enforcement inquiry; and

(3) there is reason to believe that such notice will result in—

(A) endangering life or physical safety of any person;

(B) flight from prosecution;

(C) destruction of or tampering with evidence;

(D) intimidation of potential witnesses; or

(E) otherwise seriously jeopardizing an investigation or official proceeding or unduly delaying a trial or ongoing official proceeding to the same extent as the circumstances in the preceding [1] subparagraphs.

An application for delay must be made with reasonable specificity.

Grant of delay order; duration and specifications; extensions; copy of request and notice to customer

(b)(1) If the court makes the findings required in paragraphs (1), (2), and (3) of subsection (a) of this section, it shall enter an ex parte order granting the requested delay for a period not to exceed ninety days and an order prohibiting the financial institution from disclosing that records have been obtained or that a request for records has been made, except that, if the records have been sought by a Government authority exercising financial controls over foreign accounts in the United States under section 5(b) of the Trading with the Enemy Act, the International Emergency Economic Powers Act, or section 5 of the United Nations Participation Act, and the court finds that there is reason to believe that such notice may endanger the lives or physical safety of a customer or group of customers, or any person or group of persons associated with a customer, the court may specify that the delay be indefinite.

(2) Extensions of the delay of notice provided in paragraph (1) of up to ninety days each may be granted by the court upon application, but only in accordance with this subsection.

(3) Upon expiration of the period of delay of notification under paragraph (1) or (2), the customer shall be served with or mailed a copy of the process or request together with the following notice which shall state with reasonable specificity the nature of the law enforcement inquiry:

"Records or information concerning your transactions which are held by the financial institution named in the attached process or request were supplied to or requested by the Government authority named in the process or request on (date). Notification was withheld pursuant to a determination by the (title of court so ordering) under the Right to Financial Privacy Act of 1978 that such notice might (state reason).

The purpose of the investigation or official proceeding was ."

Notice requirement respecting emergency access to financial records

(c) When access to financial records is obtained pursuant to section 3414(b) of this title (emergency access), the Government authority shall, unless a court has authorized delay of notice pursuant to subsections (a) and (b) of this section, as soon as practicable after such records are obtained serve upon the customer, or mail by registered or certified mail to his last known address, a copy of the request to the financial institution together with the following notice which shall state with reasonable specificity the nature of the law enforcement inquiry:

"Records concerning your transactions held by the financial institution named in the attached request were obtained by (agency or department)

under the Right to Financial Privacy Act of 1978 on (date) for the following purpose: Emergency access to such records was obtained on the grounds that (state grounds).".

Preservation of memorandums, affidavits, or other papers

(d) Any memorandum, affidavit, or other paper filed in connection with a request for delay in notification shall be preserved by the court. Upon petition by the customer to whom such records pertain, the court may order disclosure of such papers to the petitioner unless the court makes the findings required in subsection (a) of this section.

Pub.L. 95-630, Title XI, § 1109, Nov. 10, 1978, 92 Stat. 3702.

[1] So in original. Probably should read "preceding".

References in Text. Section 5(b) of the Trading with the Enemy Act, referred to in subsec. (b)(1), is classified to section 5(b) of the Appendix to Title 50, War and National Defense.

The International Emergency Economic Powers Act, referred to in subsec. (b)(1), is Title II of Pub.L. 95-223, Dec. 28, 1977, 91 Stat. 1626, which is classified to section 1701 et seq. of Title 50, War and National Defense.

Section 5 of the United Nations Participation Act, referred to in subsec. (b)(1), is classified to section 287c of Title 22, Foreign Relations and Intercourse.

The Right to Financial Privacy Act of 1978, referred to in subsecs. (b)(3) and (c), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3410. Customer challenges—Filing of motion to quash or application to enjoin; proper court; contents

(a) Within ten days of service or within fourteen days of mailing of a subpena, summons, or formal written request, a customer may file a motion to quash an administrative summons or judicial subpena, or an application to enjoin a Government authority from obtaining financial records pursuant to a formal written request, with copies served upon the Government authority. A motion to quash a judicial subpena shall be filed in the court which issued the subpena. A motion to quash an administrative summons or an application to enjoin a Government authority from obtaining records pursuant to a formal written request shall be filed in the appropriate United States district court. Such motion or application shall contain an affidavit or sworn statement—

(1) stating that the applicant is a customer of the financial institution from which financial records pertaining to him have been sought; and

(2) stating the applicant's reasons for believing that the financial records sought are not relevant to the legitimate law enforcement inquiry stated by the Government authority in its notice, or that there has not been substantial compliance with the provisions of this chapter.

Service shall be made under this section upon a Government authority by delivering or mailing by registered or certified mail a copy of the papers to the person, office, or department specified in the notice which the customer has received pursuant to this chapter. For the purposes of this section, "delivery" has the meaning stated in rule 5(b) of the Federal Rules of Civil Procedure.

Filing of response; additional proceedings

(b) If the court finds that the customer has complied with subsection (a) of this section, it shall order the Government authority to file a sworn response, which may be filed in camera if the Government includes in its response the reasons which make in camera review appropriate. If the court is unable to determine the motion or application on the basis of the parties' initial allegations and response, the court may conduct such additional proceedings as it deems appropriate. All such proceedings shall be completed and the motion or application decided within seven calendar days of the filing of the Government's response.

Decision o

(c) If the court finds that the app the financial records sought by the Go there is a demonstrable reason to be quiry is legitimate and a reasonable relevant to that inquiry, it shall deny the case of an administrative summon warrant, order such process enforce plicant is the customer to whom the authority pertain, and that there is n that the law enforcement inquiry is that the records sought are relevant t been substantial compliance with the order the process quashed or shall formal written request.

Appe

(d) A court ruling denying a moti shall not be deemed a final order a taken therefrom by the customer. An or application under this section may such period of time as provided by la order in any legal proceeding initiated upon the financial records, or (2) wi that no legal proceeding is contempl authority obtaining the financial reco when a determination has been mad him is contemplated. After one hund of the motion or application, if the records has not initiated such a proc Government authority shall certify to determination has been made. The c tions be made, at reasonable interval to the customer has occurred or a leg in clause (A).

Sole judicial remedy a

(e) The challenge procedures of dicial remedy available to a custom records pursuant to this chapter.

Affect on challenges b

(f) Nothing in this chapter shall financial institution to challenge req ment authority under existing law, a customer to assert the rights of a fin Pub.L. 95-630, Title XI, § 1110, Nov.

References in Text. Rule 5(b) of the Federal Rules of Civil Procedure, referred to in subsec. (a), is set out in Title 28, Judiciary and Judicial Procedure.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set

§ 3411. Duty of financial institu

Upon receipt of a request for fina authority under section 3405 or 3407 shall, unless otherwise provided by requested and must be prepared to c authority upon receipt of the certifi of this title.

Pub.L. 95-630, Title XI, § 1111, Nov.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

acy Act of 1978 on (date) for the Emergency access to such records ate grounds).".

ns, affidavits, or other papers

. or other paper filed in connection tion shall be preserved by the court. whom such records pertain, the court s to the petitioner unless the court tion (a) of this section.

10, 1978, 92 Stat. 3702.

preceding".

The Right to Financial Privacy Act of 1978, referred to in subsecs. (b)(3) and (c), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

iling of motion to quash or applica-

within fourteen days of mailing of a en request, a customer may file a summons or judicial subpena, or an authority from obtaining financial n request, with copies served upon n to quash a judicial subpena shall he subpena. A motion to quash an tion to enjoin a Government author- to a formal written request shall be es district court. Such motion or r sworn statement—

is a customer of the financial in- ecords pertaining to him have been

sons for believing that the financial to the legitimate law enforcement nt authority in its notice, or that mpliance with the provisions of this

tion upon a Government authority ed or certified mail a copy of the tment specified in the notice which this chapter. For the purposes of g stated in rule 5(b) of the Federal

ditional proceedings

omer has complied with subsection ie Government authority to file a camera if the Government includes ike in camera review appropriate. motion or application on the basis response, the court may conduct appropriate. All such proceedings application decided within seven ment's response.

Decision of court

(c) If the court finds that the applicant is not the customer to whom the financial records sought by the Government authority pertain, or that there is a demonstrable reason to believe that the law enforcement inquiry is legitimate and a reasonable belief that the records sought are relevant to that inquiry, it shall deny the motion or application, and, in the case of an administrative summons or court order other than a search warrant, order such process enforced. If the court finds that the applicant is the customer to whom the records sought by the Government authority pertain, and that there is not a demonstrable reason to believe that the law enforcement inquiry is legitimate and a reasonable belief that the records sought are relevant to that inquiry, or that there has not been substantial compliance with the provisions of this chapter, it shall order the process quashed or shall enjoin the Government authority's formal written request.

Appeals

(d) A court ruling denying a motion or application under this section shall not be deemed a final order and no interlocutory appeal may be taken therefrom by the customer. An appeal of a ruling denying a motion or application under this section may be taken by the customer (1) within such period of time as provided by law as part of any appeal from a final order in any legal proceeding initiated against him arising out of or based upon the financial records, or (2) within thirty days after a notification that no legal proceeding is contemplated against him. The Government authority obtaining the financial records shall promptly notify a customer when a determination has been made that no legal proceeding against him is contemplated. After one hundred and eighty days from the denial of the motion or application, if the Government authority obtaining the records has not initiated such a proceeding, a supervisory official of the Government authority shall certify to the appropriate court that no such determination has been made. The court may require that such certifications be made, at reasonable intervals thereafter, until either notification to the customer has occurred or a legal proceeding is initiated as described in clause (A).

Sole judicial remedy available to customer

(e) The challenge procedures of this chapter constitute the sole judicial remedy available to a customer to oppose disclosure of financial records pursuant to this chapter.

Affect on challenges by financial institutions

(f) Nothing in this chapter shall enlarge or restrict any rights of a financial institution to challenge requests for records made by a Government authority under existing law. Nothing in this chapter shall entitle a customer to assert the rights of a financial institution.

Pub.L. 95-630, Title XI, § 1110, Nov. 10, 1978, 92 Stat. 3703.

References in Text. Rule 5(b) of the Federal Rules of Civil Procedure, referred to in subsec. (a), is set out in Title 28, Judiciary and Judicial Procedure.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3411. Duty of financial institutions

Upon receipt of a request for financial records made by a Government authority under section 3405 or 3407 of this title, the financial institution shall, unless otherwise provided by law, proceed to assemble the records requested and must be prepared to deliver the records to the Government authority upon receipt of the certificate required under section 3403(b) of this title.

Pub.L. 95-630, Title XI, § 1111, Nov. 10, 1978, 92 Stat. 3705.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3412. Use of information—Transfer of financial records to other agencies or departments; certification

(a) Financial records originally obtained pursuant to this chapter shall not be transferred to another agency or department unless the transferring agency or department certifies in writing that there is reason to believe that the records are relevant to a legitimate law enforcement inquiry within the jurisdiction of the receiving agency or department.

Mailing of copy of certification and notice to customer

(b) When financial records subject to this chapter are transferred pursuant to subsection (a) of this section, the transferring agency or department shall, within fourteen days, send to the customer a copy of the certification made pursuant to subsection (a) of this section and the following notice, which shall state the nature of the law enforcement inquiry with reasonable specificity: "Copies of, or information contained in, your financial records lawfully in possession of have been furnished to pursuant to the Right of Financial Privacy Act of 1978 for the following purpose: If you believe that this transfer has not been made to further a legitimate law enforcement inquiry, you may have legal rights under the Financial Privacy Act of 1978 or the Privacy Act of 1974."

Court-ordered delays in mailing

(c) Notwithstanding subsection (b) of this section, notice to the customer may be delayed if the transferring agency or department has obtained a court order delaying notice pursuant to section 3409(a) and (b) of this title and that order is still in effect, or if the receiving agency or department obtains a court order authorizing a delay in notice pursuant to section 3409(a) and (b) of this title. Upon the expiration of any such period of delay, the transferring agency or department shall serve to the customer the notice specified in subsection (b) of this section and the agency or department that obtained the court order authorizing a delay in notice pursuant to section 3409(a) and (b) of this title shall serve to the customer the notice specified in section 3409(b) of this title.

Exchanges of examination reports by supervisory agencies; transfer of financial records to defend customer action; withholding of information

(d) Nothing in this chapter prohibits any supervisory agency from exchanging examination reports or other information with another supervisory agency. Nothing in this chapter prohibits the transfer of a customer's financial records needed by counsel for a Government authority to defend an action brought by the customer. Nothing in this chapter shall authorize the withholding of information by any officer or employee of a supervisory agency from a duly authorized committee or subcommittee of the Congress.

Pub.L. 95-630, Title XI, § 1112, Nov. 10, 1978, 92 Stat. 3705.

References in Text. The Right to Financial Privacy Act of 1978, referred to in subsec. (b), is classified to this chapter.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3413. Exceptions—Disclosure of financial records not identified with particular customers

(a) Nothing in this chapter prohibits the disclosure of any financial records or information which is not identified with or identifiable as being derived from the financial records of a particular customer.

Disclosure pursuant to exercise of supervisory, regulatory, or monetary functions of financial institutions

(b) Nothing in this chapter prohibits examination by or disclosure to any supervisory agency of financial records or information in the exercise

of its supervisory, regulatory, or m
financial institution.

Disclosure pursuant to

(c) Nothing in this chapter prohib
in accordance with procedures authc

Disclosure pursuant to Federal stat

(d) Nothing in this chapter shall
records or information required to
Federal statute or rule promulgated t

Disclosure pursuant to Federa or comparable rul

(e) Nothing in this chapter sha
sought by a Government authority
Criminal Procedure or comparable
with litigation to which the Govern
parties.

Disclosure pursuant to admi administrati

(f) Nothing in this chapter sha
sought by a Government authority
pena issued by an administrative la
ing subject to section 554 of Title
thority and the customer are parties.

Disclosure pursuant to legiti respecting name, address, account of part

(g) The notice requirements of
3412 of this title shall not apply wh
described in section 3402 of this ti
ment inquiry is seeking only the
type of account of any customer
associated (1) with a financial tr
actions, or (2) with a foreign coun
of a Government authority exercisi
counts in the United States under
Enemy Act; the International E
section 5 of the United Nations Parti

Disclosure pursuant to lawful proc financial institution or legal ent tion respecting Governmen

(h)(1) Nothing in this chapter
of this title) shall apply when fina
ment authority—

(A) in connection with a
amination, or inspection direc
session of such records or at a
or

(B) in connection with th
istration of assistance to the
loan, loan guaranty, or loan ins

(2) When financial records ar
the Government authority shall s
certificate required by section 340
to paragraph (1)(B), no further
sequent access by the certifying
of the loan, loan guaranty, or loan i

(3) After the effective date of
plies for participation in a Gover
surance program, the Government

nsfer of financial records to other

obtained pursuant to this chapter
agency or department unless the
tifies in writing that there is reason
nt to a legitimate law enforcement
receiving agency or department.

ion and notice to customer

ct to this chapter are transferred
section, the transferring agency or
s, send to the customer a copy of the
ction (a) of this section and the
he nature of the law enforcement
Copies of, or information contained
possession of have
ursuant to the Right of Financial
purpose: If you
n made to further a legitimate law
legal rights under the Financial
of 1974."

lays in mailing

) of this section, notice to the cus-
ring agency or department has ob-
ursuant to section 3409(a) and (b)
n effect, or if the receiving agency
authorizing a delay in notice pur-
this title. Upon the expiration of
ferring agency or department shall
fied in subsection (b) of this section
btained the court order authorizing
3409(a) and (b) of this title shall
fied in section 3409(b) of this title.

rts by supervisory agencies; to defend customer action; information

ibits any supervisory agency from
ier information with another super-
ter prohibits the transfer of a cus-
unsel for a Government authority to
mer. Nothing in this chapter shall
ion by any officer or employee of a
norized committee or subcommittee

0, 1978, 92 Stat. 3705.

out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

f financial records not identified

its the disclosure of any financial
ntified with or identifiable as being
particular customer.

of supervisory, regulatory, financial institutions

its examination by or disclosure to
cords or information in the exercise

its supervisory, regulatory, or monetary functions with respect to a financial institution.

Disclosure pursuant to Internal Revenue Code

(c) Nothing in this chapter prohibits the disclosure of financial records in accordance with procedures authorized by the Internal Revenue Code.

Disclosure pursuant to Federal statute or rule promulgated thereunder

(d) Nothing in this chapter shall authorize the withholding of financial records or information required to be reported in accordance with any Federal statute or rule promulgated thereunder.

Disclosure pursuant to Federal Rules of Criminal Procedure or comparable rules of other courts

(e) Nothing in this chapter shall apply when financial records are sought by a Government authority under the Federal Rules of Civil or Criminal Procedure or comparable rules of other courts in connection with litigation to which the Government authority and the customer are parties.

Disclosure pursuant to administrative subpena issued by administrative law judge

(f) Nothing in this chapter shall apply when financial records are sought by a Government authority pursuant to an administrative subpena issued by an administrative law judge in an adjudicatory proceeding subject to section 554 of Title 5, and to which the Government authority and the customer are parties.

Disclosure pursuant to legitimate law enforcement inquiry respecting name, address, account number, and type of account of particular customers

(g) The notice requirements of this chapter and sections 3410 and 3412 of this title shall not apply when a Government authority by a means described in section 3402 of this title and for a legitimate law enforcement inquiry is seeking only the name, address, account number, and type of account of any customer or ascertainable group of customers associated (1) with a financial transaction or class of financial transactions, or (2) with a foreign country or subdivision thereof in the case of a Government authority exercising financial controls over foreign accounts in the United States under section 5(b) of the Trading with the Enemy Act; the International Emergency Economic Powers Act; or section 5 of the United Nations Participation Act.

Disclosure pursuant to lawful proceeding, investigation, etc., directed at financial institution or legal entity or consideration or administration respecting Government loans, loan guarantees, etc.

(h)(1) Nothing in this chapter (except sections 3403, 3417 and 3418 of this title) shall apply when financial records are sought by a Government authority—

(A) in connection with a lawful proceeding, investigation, examination, or inspection directed at the financial institution in possession of such records or at a legal entity which is not a customer; or

(B) in connection with the authority's consideration or administration of assistance to the customer in the form of a Government loan, loan guaranty, or loan insurance program.

(2) When financial records are sought pursuant to this subsection, the Government authority shall submit to the financial institution the certificate required by section 3403(b) of this title. For access pursuant to paragraph (1)(B), no further certification shall be required for subsequent access by the certifying Government authority during the term of the loan, loan guaranty, or loan insurance agreement.

(3) After the effective date of this chapter, whenever a customer applies for participation in a Government loan, loan guaranty, or loan insurance program, the Government authority administering such program

shall give the customer written notice of the authority's access rights under this subsection. No further notification shall be required for subsequent access by that authority during the term of the loan, loan guaranty, or loan insurance agreement.

(4) Financial records obtained pursuant to this subsection may be used only for the purpose for which they were originally obtained, and may be transferred to another agency or department only when the transfer is to facilitate a lawful proceeding, investigation, examination, or inspection directed at the financial institution in possession of such records, or at a legal entity which is not a customer, except that—

(A) nothing in this paragraph prohibits the use or transfer of a customer's financial records needed by counsel representing a Government authority in a civil action arising from a Government loan, loan guaranty, or loan insurance agreement; and

(B) nothing in this paragraph prohibits a Government authority providing assistance to a customer in the form of a loan, loan guaranty, or loan insurance agreement from using or transferring financial records necessary to process, service or foreclose a loan, or to collect on an indebtedness to the Government resulting from a customer's default.

(5) Notification that financial records obtained pursuant to this subsection may relate to a potential civil, criminal, or regulatory violation by a customer may be given to an agency or department with jurisdiction over that violation, and such agency or department may then seek access to the records pursuant to the provisions of this chapter.

(6) Each financial institution shall keep a notation of each disclosure made pursuant to paragraph (1)(B) of this subsection, including the date of such disclosure and the Government authority to which it was made. The customer shall be entitled to inspect this information.

Disclosure pursuant to issuance of subpena or court order respecting grand jury proceeding

(i) Nothing in this chapter (except sections 3415 and 3420 of this title) shall apply to any subpena or court order issued in connection with proceedings before a grand jury.

Disclosure pursuant to proceeding, investigation, etc., instituted by General Accounting Office and directed at a government authority

(j) This chapter shall not apply when financial records are sought by the General Accounting Office pursuant to an authorized proceeding, investigation, examination or audit directed at a government authority.

Pub.L. 95-630, Title XI, § 1113, Nov. 10, 1978, 92 Stat. 3706.

References in Text. The Federal Rules of Civil Procedure, referred to in subsec. (e), are set out in Title 28, Judiciary and Judicial Procedure.

The Federal Rules of Criminal Procedure, referred to in subsec. (e), are set out in Title 18, Crimes and Criminal Procedure.

The International Emergency Economic Powers Act, referred to in subsec. (g), is Title II of Pub.L. 95-223, Dec. 28, 1977, 91 Stat. 1626, which is classified to section 1701 et seq. of Title 50, War and National Defense.

Section 5(b) of the Trading with the Enemy Act, referred to in subsec. (g), is classified to section 5(b) of the Appendix to Title 50, War and National Defense.

Section 5 of the United Nations Participation Act, referred to in subsec. (g), is classified to section 287c of Title 22, Foreign Relations and Intercourse.

For effective date of this chapter, referred to in subsec. (h)(3), see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3414. Special procedures

(a)(1) Nothing in this chapter (except sections 3415, 3417, 3418, and 3421 of this title) shall apply to the production and disclosure of financial records pursuant to requests from—

(A) a Government authority authorized to conduct foreign counter- or foreign positive-intelligence activities for purposes of conducting such activities; or

(B) the Secret Service for the p
functions (18 U.S.C. 3056; 3 U.
amended).

(2) In the instances specified in pa
thority shall submit to the financial
in section 3403(b) of this title signed
designated by the head of the Governme

(3) No financial institution, or of
institution, shall disclose to any per
described in paragraph (1) has sought
financial records.

(4) The Government authority speci
an annual tabulation of the occasions

(b)(1) Nothing in this chapter sha
from obtaining financial records from
ment authority determines that delay
would create imminent danger of—

(A) physical injury to any pers
(B) serious property damage;
(C) flight to avoid prosecution.

(2) In the instances specified in pa
submit to the financial institution of
3403(b) of this title signed by a supe
by the head of the Government authorit

(3) Within five days of obtaining
this subsection, the Government autho
court a signed, sworn statement of a
nated by the head of the Government
for the emergency access. The Gov
comply with the notice provisions of s

(4) The Government authority spe
pile an annual tabulation of the occas
Pub.L. 95-630, Title XI, § 1114, Nov.

References in Text. (18 U.S.C. 3056; 3 U.S.C. 202, Public Law 90-331, as amended), referred to in subsec. (a)(1)(B), are classified to section 3056 of Title 18, Crimes and Criminal Procedure, section 202 of Title 3, The President, and set out as a note under section 3056 of Title 18, respectively.

§ 3415. Cost reimbursement

Except for records obtained pursu
through (h) of this title, or as other
authority shall pay to the financial
financial records pertaining to a cus
cedures established by this chapter a
as are reasonably necessary and wh
searching for, reproducing, or tran
other data required or requested to be
of the Federal Reserve System shall
and conditions under which such paym
Pub.L. 95-630, Title XI, § 1115(a),

Effective Date. Section 1115(b) of Pub.L. 95-630 provided that: "This section shall take effect on October 1, 1979."

§ 3416. Jurisdiction

An action to enforce any provisio
any appropriate United States district

e of the authority's access rights
ification shall be required for sub-
g the term of the loan, loan guar-

rsuant to this subsection may be
they were originally obtained, and
or department only when the trans-
ng, investigation, examination, or
institution in possession of such
ot a customer, except that—
prohibits the use or transfer of
eeded by counsel representing a
action arising from a Government
ice agreement; and
prohibits a Government authority
ier in the form of a loan, loan
ement from using or transferring
ocess, service or foreclose a loan,
to the Government resulting from

rds obtained pursuant to this sub-
, criminal, or regulatory violation
cy or department with jurisdiction
department may then seek access
of this chapter.

keep a notation of each disclosure
of this subsection, including the
nment authority to which it was
to inspect this information.

of subpena or court order
ry proceeding

sections 3415 and 3420 of this
rt order issued in connection with

tigation, etc., instituted by General
t a government authority

n financial records are sought by
nt to an authorized proceeding,
cted at a government authority.
. 1978, 92 Stat. 3706.

Section 5 of the United Nations Partici-
tion Act, referred to in subsec. (g), is
ssified to section 287c of Title 22, For-
n Relations and Intercourse.
For effective date of this chapter, re-
red to in subsec. (h)(3), see section
01 of Pub.L. 95-630, set out as a note
der section 375b of this title.
Effective Date. Section effective upon
e expiration of 120 days after Nov. 10,
78, see section 2101 of Pub.L. 95-630, set
t as a note under section 375b of this
le.
Legislative History. For legislative
tory and purpose of Pub.L. 95-630, see
78 U.S.Code Cong. and Adm.News, p.
3.

pt sections 3415, 3417, 3418, and
production and disclosure of fi-

authorized to conduct foreign
gence activities for purposes of

(B) the Secret Service for the purpose of conducting its protective functions (18 U.S.C. 3056; 3 U.S.C. 202, Public Law 90-331, as amended).

(2) In the instances specified in paragraph (1), the Government authority shall submit to the financial institution the certificate required in section 3403(b) of this title signed by a supervisory official of a rank designated by the head of the Government authority.

(3) No financial institution, or officer, employee, or agent of such institution, shall disclose to any person that a Government authority described in paragraph (1) has sought or obtained access to a customer's financial records.

(4) The Government authority specified in paragraph (1) shall compile an annual tabulation of the occasions in which this section was used.

(b)(1) Nothing in this chapter shall prohibit a Government authority from obtaining financial records from a financial institution if the Government authority determines that delay in obtaining access to such records would create imminent danger of—

(A) physical injury to any person;

(B) serious property damage; or

(C) flight to avoid prosecution.

(2) In the instances specified in paragraph (1), the Government shall submit to the financial institution of the certificate required in section 3403(b) of this title signed by a supervisory official of a rank designated by the head of the Government authority.

(3) Within five days of obtaining access to financial records under this subsection, the Government authority shall file with the appropriate court a signed, sworn statement of a supervisory official of a rank designated by the head of the Government authority setting forth the grounds for the emergency access. The Government authority shall thereafter comply with the notice provisions of section 3409(c) of this title.

(4) The Government authority specified in paragraph (1) shall compile an annual tabulation of the occasions in which this section was used. Pub.L. 95-630, Title XI, § 1114, Nov. 10, 1978, 92 Stat. 3707.

References in Text. (18 U.S.C. 3056; 3 U.S.C. 202, Public Law 90-331, as amended), referred to in subsec. (a)(1)(B), are classified to section 3056 of Title 18, Crimes and Criminal Procedure, section 202 of Title 3, The President, and set out as a note under section 3056 of Title 18, respectively.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95-630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3415. Cost reimbursement

Except for records obtained pursuant to section 3403(d) or 3413(a) through (h) of this title, or as otherwise provided by law, a Government authority shall pay to the financial institution assembling or providing financial records pertaining to a customer and in accordance with procedures established by this chapter a fee for reimbursement for such costs as are reasonably necessary and which have been directly incurred in searching for, reproducing, or transporting books, papers, records, or other data required or requested to be produced. The Board of Governors of the Federal Reserve System shall, by regulation, establish the rates and conditions under which such payment may be made.
Pub.L. 95-630, Title XI, § 1115(a), Nov. 10, 1978, 92 Stat. 3708.

Effective Date. Section 1115(b) of Pub.L. 95-630 provided that: "This section shall take effect on October 1, 1979."

Legislative History. For legislative history and purpose of Pub.L. 95-630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3416. Jurisdiction

An action to enforce any provision of this chapter may be brought in any appropriate United States district court without regard to the amount

in controversy within three years from the date on which the violation occurs or the date of discovery of such violation, whichever is later.
Pub.L. 95–630, Title XI, § 1116, Nov. 10, 1978, 92 Stat. 3708.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3417. Civil penalties—Liability of agencies or departments of United States or financial institutions

(a) Any agency or department of the United States or financial institution obtaining or disclosing financial records or information contained therein in violation of this chapter is liable to the customer to whom such records relate in an amount equal to the sum of—

(1) $100 without regard to the volume of records involved;

(2) any actual damages sustained by the customer as a result of the disclosure;

(3) such punitive damages as the court may allow, where the violation is found to have been willful or intentional; and

(4) in the case of any successful action to enforce liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

Disciplinary action for willful or intentional violation of chapter by agents or employees of department or agency

(b) Whenever the court determines that any agency or department of the United States has violated any provision of this chapter and the court finds that the circumstances surrounding the violation raise questions of whether an officer or employee of the department or agency acted willfully or intentionally with respect to the violation, the Civil Service Commission shall promptly initiate a proceeding to determine whether disciplinary action is warranted against the agent or employee who was primarily responsible for the violation. The Commission after investigation and consideration of the evidence submitted, shall submit its findings and recommendations to the administrative authority of the agency concerned and shall send copies of the findings and recommendations to the officer or employee or his representative. The administrative authority shall take the corrective action that the Commission recommends.

Good faith defense

(c) Any financial institution or agent or employee thereof making a disclosure of financial records pursuant to this chapter in good-faith reliance upon a certificate by any Government authority shall not be liable to the customer for such disclosure.

Exclusive judicial remedies and sanctions

(d) The remedies and sanctions described in this chapter shall be the only authorized judicial remedies and sanctions for violations of this chapter.
Pub.L. 95–630, Title XI, § 1117, Nov. 10, 1978, 92 Stat. 3708.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3418. Injunctive relief

In addition to any other remedy contained in this chapter, injunctive relief shall be available to require that the procedures of this chapter are

complied with. In the event of any s
reasonable attorney's fees as determin
Pub.L. 95–630, Title XI, § 1118, Nov. 1

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

§ 3419. Suspension of limitations

If any individual files a motion or
has the effect of delaying the access
cial records pertaining to such individ
tions shall be deemed to be tolled for
such motion or application was filed u
or application is decided.
Pub.L. 95–630, Title XI, § 1119, Nov. 1

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

§ 3420. Grand jury information

Financial records about a custome
tion pursuant to a subpena issued un
jury—

(1) shall be returned and act

(2) shall be used only for t
to issue an indictment or pres
prosecuting a crime for which
issued, or for a purpose authoriz
of Criminal Procedure;

(3) shall be destroyed or ret
not used for one of the purposes

(4) shall not be maintained,
such records shall not be maint
other than in the sealed recor
record has been used in the pr
grand jury issued an indictmer
authorized by rule 6(e) of the F
Pub.L. 95–630, Title XI, § 1120, Nov.

References in Text. Rule 6(e) of the Federal Rules of Criminal Procedure, referred to in pars. (2) and (4), is set out in Title 18, Crimes and Criminal Procedure.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10,

§ 3421. Reporting requirements

(a) In April of each year, the Dir
the United States Courts shall send t
gress a report concerning the numbe
made pursuant to section 3409 of tl
challenges made pursuant to section 3
calendar year. Such report shall incl
authority requesting a delay of notice
and the number granted under each
of this title; the number of notice de
granted; and the number of custon
that are successful.

(b) In April of each year, each G
cess to financial records of any cust
suant to section 3404, 3405, 3406, 3
shall send to the appropriate commi

complied with. In the event of any successful action, costs together with reasonable attorney's fees as determined by the court may be recovered.
Pub.L. 95–630, Title XI, § 1118, Nov. 10, 1978, 92 Stat. 3709.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3419. Suspension of limitations

If any individual files a motion or application under this chapter which has the effect of delaying the access of a Government authority to financial records pertaining to such individual, any applicable statute of limitations shall be deemed to be tolled for the period extending from the date such motion or application was filed until the date upon which the motion or application is decided.
Pub.L. 95–630, Title XI, § 1119, Nov. 10, 1978, 92 Stat. 3709.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3420. Grand jury information

Financial records about a customer obtained from a financial institution pursuant to a subpena issued under the authority of a Federal grand jury—

(1) shall be returned and actually presented to the grand jury;

(2) shall be used only for the purpose of considering whether to issue an indictment or presentment by that grand jury, or of prosecuting a crime for which that indictment or presentment is issued, or for a purpose authorized by rule 6(e) of the Federal Rules of Criminal Procedure;

(3) shall be destroyed or returned to the financial institution if not used for one of the purposes specified in paragraph (2); and

(4) shall not be maintained, or a description of the contents of such records shall not be maintained by any Government authority other than in the sealed records of the grand jury, unless such record has been used in the prosecution of a crime for which the grand jury issued an indictment or presentment or for a purpose authorized by rule 6(e) of the Federal Rules of Criminal Procedure.
Pub.L. 95–630, Title XI, § 1120, Nov. 10, 1978, 92 Stat. 3709.

References in Text. Rule 6(e) of the Federal Rules of Criminal Procedure, referred to in pars. (2) and (4), is set out in Title 18, Crimes and Criminal Procedure.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3421. Reporting requirements

(a) In April of each year, the Director of the Administrative Office of the United States Courts shall send to the appropriate committees of Congress a report concerning the number of applications for delays of notice made pursuant to section 3409 of this title and the number of customer challenges made pursuant to section 3410 of this title during the preceding calendar year. Such report shall include: the identity of the Government authority requesting a delay of notice; the number of notice delays sought and the number granted under each subparagraph of section 3409(a)(3) of this title; the number of notice delay extensions sought and the number granted; and the number of customer challenges made and the number that are successful.

(b) In April of each year, each Government authority that requests access to financial records of any customer from a financial institution pursuant to section 3404, 3405, 3406, 3407, 3408, 3409, or 3414 of this title shall send to the appropriate committees of Congress a report describing

requests made during the preceding calendar year. Such report shall include the number of requests for records made pursuant to each section of this title listed in the preceding sentence and any other related information deemed relevant or useful by the Government authority.

Pub.L. 95–630, Title XI, § 1121, Nov. 10, 1978, 92 Stat. 3710.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

§ 3422. Applicability to Securities and Exchange Commission

The Securities and Exchange Commission shall not be subject to the provisions of this chapter for a period of two years from November 10, 1978.

Pub.L. 95–630, Title XI, § 1122, Nov. 10, 1978, 92 Stat. 3710.

Effective Date. Section effective upon the expiration of 120 days after Nov. 10, 1978, see section 2101 of Pub.L. 95–630, set out as a note under section 375b of this title.

Legislative History. For legislative history and purpose of Pub.L. 95–630, see 1978 U.S.Code Cong. and Adm.News, p. 9273.

INDEX

CONSULT GENERAL INDEX

†

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Re: MUR 1158

Dear Mr. Ward:

I am enclosing a set of written questions, an Order of the Commission, and a Certificate of Compliance with the Right to Financial Privacy Act of 1978, all directed to Maryland National Bank. It is my understanding that you are the legal counsel for the bank and these materials have therefore been mailed to you for answers on its behalf.

I would like to remind you of the provisions of 2 U.S.C. § 437g(a)(12) which prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made You are advised that no such consent has been given in this case.

If you have any questions, please call Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes an Order to Answer Written Questions to be issued to:

Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

Robert O. Tiernan
Chairman

Thomas E. Harris
Commissioner

Max L. Friedersdorf
Vice Chairman

John W. McGarry
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

EXECUTIVE SESSION
February 12, 1980

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OFFICE OF GENERAL TO THE COMMISSION FEB 1980

80 FEB 11 8 4:

MUR: 1158

STAFF MEMBERS:
Kevin H. Smith
Marsha Gentner

Submitted Late

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: Debra J. Hanania, a.k.a. Debra Hanania Freeman, a.k.a. Debra Hanania

RELEVANT STATUTES AND REGULATIONS: 2 U.S.C. §441f; 26 U.S.C. § 9042(c)(1)(A); 11 C.F.R. § 9034.2(c)(2)

INTERNAL REPORTS CHECKED: Audit Division Referral Memorandum dated February 6, 1980 and Citizens For LaRouche Matching Fund Submission #3

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

This matter arises out of the Audit Division's review of the third matching fund submission of Citizens for LaRouche [hereinafter ("CFL")] convering the period from January 1, 1980, to January 25, 1980. In the course of this review, the Audit Division found what they felt were several instances wherein signatures that purported to be of the same individual looked very different from other purported signatures of the same individual (but in the auditors' opinion looked very similar to the purported signatures of other individuals). In another instance, a cashiers check had apparently been annotated by two different typewriters in a manner which puts into question the identification of the individual purportedly requesting the instrument. These and other possible irregularities caused the Audit Division to refer the information to this office by memorandum dated February 6, 1980, for possible enforcement action.

FACTUAL AND LEGAL ANALYSIS

I. FACTS

A. The "David Sanders" Contributions

The Audit Division referral contains copies of five (5) documents which were submitted by CFL to evidence three (3) contributions by "David Sanders". Those documents are hereafter

Before making signature comparisons, one must decide what constitutes a signature. It should first be noted that money orders may legally be purchased by anyone, and the purchaser is not required to sign it in order to purchase it; also, the bearer of a money order is not required to sign it in order to negotiate it. Therefore, the name written on Sanders Document (3) is not legally required to be the signature of David Sanders in order for it to be a perfectly valid negotiable bearer instrument. The same is true for Sanders Document (5). Neither of these two writings of "David Sanders" is required to be the actual signature of David Sanders for negotiability purposes. The same is not true for Sanders Document (1); it is a check and must bear the actual signature for negotiability purposes.

Sanders Documents (2) and (4) were apparently submitted to satisfy 11 C.F.R. §§ 9034.2(c) which basically requires an instrument submitted for matching to be accompanied by a written document containing the signatures of the contributors if, and only if, such signatures do not appear on the instrument itself. Thus, we can assume that Sanders Document (4) was submitted because Sanders Document (3), to which it relates, does not actually contain the signature of David Sanders (even though "David Sanders" is written on a line labeled "Purchaser's Signature"). We can also assume that Sanders Document (2) was submitted because Sanders Document (1), although containing the signature of David C. Sanders, did not contain the signature of his wife, Lenore, who was co-contributor. By the same token, the fact that Sanders Document (5) was submitted without an accompanying document is a representation by CFL that Sanders Document (5) does contain the signature of David Sanders (even though it need not be his signature for negotiability purposes). Therefore, Sanders Documents (2), (4), and (5), necessarily purport to be the actual signatures of the same person for purposes of matching fund submissions.

Recognizing that handwriting differences can be determined authoritatively only by experts within the field, it still appears that the purported signature of "David C. Sanders" on Sanders Document (2) is so different from the purported signatures of "David Sanders" on both Sanders Documents (4) and (5), that there is reason to doubt that they were signed by the same person.

It is possible that "David Sanders" and "David C. Sanders", since they report the same address, might be father and son. However, the CFL computer printout which lists the names of the contributors whose contributions are being submitted for matching shows all three of subject contributions as having been made by the same "David Sanders" and subject to the same $250.00 maximum matching payment. Although this could have been the result of an inadequate computer program or a keypunching error, the Commission may at this stage assume in accordance with CFL's representation that all three contributions are attributable to the same David Sanders, not to a father and son.

referred to as Sanders Document(s) 1, 2, 3, 4 and 5.

SANDERS DOCUMENT 1

Date 1/23/80 Code 1-3 5-03

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

ECK NO. DATE ACCOUNT AMOUNT

75 01/22/80 $*1,000.58 ← PAY

DAVID SANDERS

BALTIMORE, MARYLAND NO. 4
NOT VALID FOR MORE THAN $10,000.00

L. E. Wall

Date 1/23/80 Code 1-3

To the order of Citizens for Lamonte Dellums

CITIZENS FOR La MOUCHE
CITIBANK

SANDERS DOCUMENT 2

January 22, 1980
(date)

I contributed $1,029.58 to Citizens for Larouche on

January 22 1980
(date)

David Sanders — signed David H. Sanders
(signature)

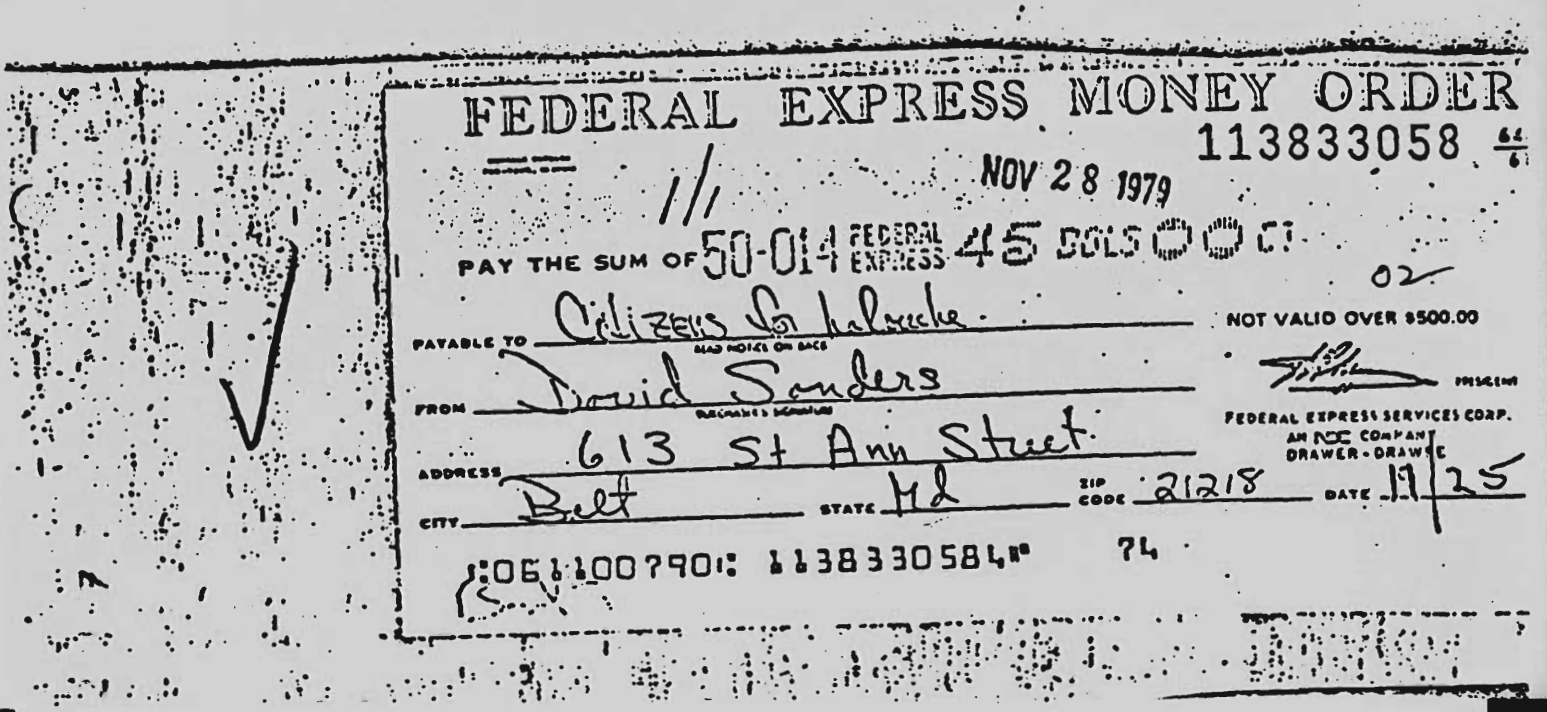
613 St. Ann's Ave. — 613 St. Ann's Ave.
(address)

Baltimore Md. — Baltimore, Md.
(City), (state)

Lenore Sanders (spouse) David Sanders

613 St. Ann's Ave
Baltimore Md.

SANDERS DOCUMENT 3



FEDERAL EXPRESS MONEY ORDER

113833058

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens for LaRouche

MAG NOTICE ON BACK

NOT VALID OVER $500.00

FROM David Sanders

PRESIDENT

FEDERAL EXPRESS SERVICES CORP.
AN FDC COMPANY
DRAWER - DRAWEE

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

:061100790: 113833058 74

SANDERS DOCUMENT 4

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

We therefore feel that there is reason to believe Sanders Documents 2, 4 and 5 purporting to be the true signature of David Sanders may have been signed by at least two different persons.

B. The "Nancy Radcliff," "Nancy Radcliffe," and "Nancy B. Radcliffe" Contributions

The Audit Division referral contains copies of three (3) documents which were submitted by CFL to evidence three contributions by "Nancy Radcliff". These documents are reproduced below as Radcliff(e) Documents (1), (2), and (3).

RADCLIFF(E) DOCUMENT 1

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 $250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF MARYLAND

Nancy Radcliff — 3215 N Charles · Balto 21218

PURCHASER, SIGNER FOR DRAWER — PURCHASER'S ADDRESS

90

RADCLIFF(E) DOCUMENT 2

NANCY RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE MD. 21218

NO. 234

December 5 1979

7-89
520

PAY TO THE ORDER OF C F L $ 20 00

Twenty and 00/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

Nancy Radcliffe

RADCLIFF(E) DOCUMENT 3

B.d.t NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE, MD. 21218

NO. 235

December 8 1979

7-89
520

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty Five and 00/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

Nancy B. Radcliffe

Radcliff(e) Document (1), being a money order, does not require a signature for negotiability. However, since it was submitted without an accompanying document, it is a representation by CFL that the actual signature of Nancy Radcliff does appear thereon; specifically, the purported signature, "Nancy Radcliff," appears on the line labeled "Purchaser, Signer for Drawer".

Radcliff(e) Document (2), being a check, requires the actual signature of the drawer/contributor for both negotiability and matching purposes. 1/ Since CFL's submission attributes this contribution to the same "Nancy Radcliff" to which Radcliff(e) Document (1) is attributed, CFL's submission constitutes a representation that Radcliff(e) Document (2) (signed "Nancy Radcliffe) is signed by the same person who signed Radcliff(e) Document (1) (signed "Nancy Radcliff").

Radcliff(e) Document (3) is a check and thus is subject to the same signature requirements as Document (2) and differs from (2) only by the addition of the middle initial "B". Since (3) is also attributed by CFL's printout to the same "Nancy Radcliff" to which both (1) and (2) are attributed, CFL has represented that (3) (signed "Nancy B. Radcliffe") is signed by the same person who signed (1) (signed "Nancy Radcliff").

While there is some difference in the appearance of the signature on (1) as compared to (2) and (3), the most significant difference is that (1) has no "e" at the end of "Radcliff," unlike (2) and (3). Although no two signatures ever look exactly alike, there is reason to doubt that the same person would not only employ two somewhat distinct handwriting styles in her signatures but also employ different spellings of her name in her signatures. We therefore feel there is reason to believe that Documents (2) and (3) may have been signed by a different person than the person who signed Document (1). More specifically, it is our opinion that, assuming Documents (2) and (3) were eventually honored by the drawee bank (Equitable Trust), there is reason to believe Documents (2) and (3) contain legitimate signatures and Document (1) may contain a signature that is not that of the individual (Nancy Radcliff(e)) who signed Documents (2) and (3).

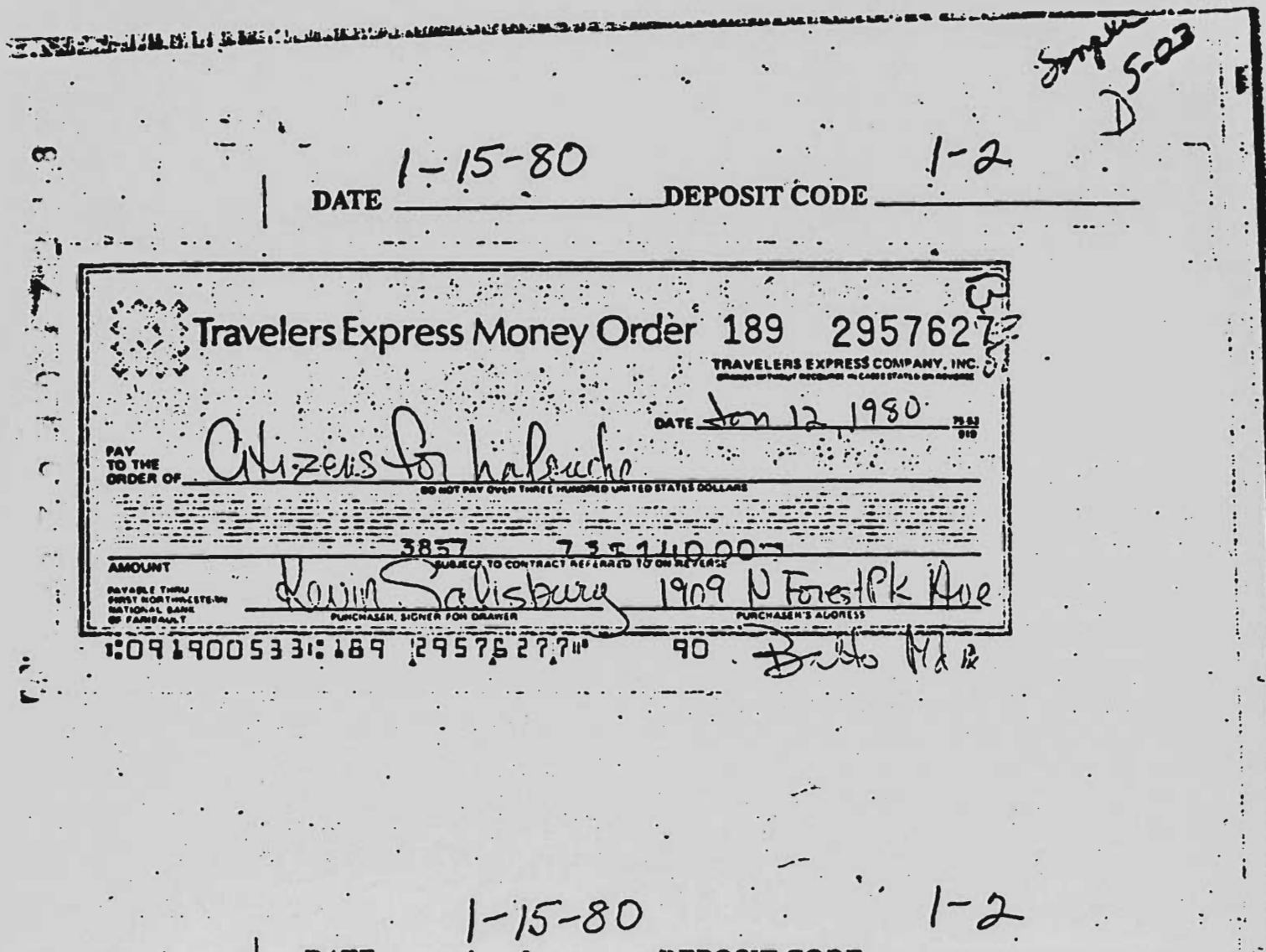
C. The "Kevin Salisbury" and "Kevin C. Salisbury" Contributions

The Audit Division referral contains copies of three docu-

1/ Although it appears that Radcliff(e) Documents (2) and (3) are checks drawn upon a joint account of "Radcliffe" and "Primack," CFL's computer printout attributes both contributions to "Nancy Radcliff" and Primack's signature does not appear on either instrument.

ments evidencing two contributions by a Kevin Salisbury. These documents are reproduced below as Salisbury Documents (1), (2), and (3).

SALISBURY DOCUMENT 1



SALISBURY DOCUMENT 2

FEDERAL EXPRESS MONEY ORDER

114504323 44-79 611

PAY THE SUM OF 450 00 CTS

PAYABLE TO Citizens for LaRouche

READ NOTICE ON BACK

NOT VALID OVER $500.00

FROM Kevin C. Salisbury

PURCHASER'S SIGNATURE

ADDRESS 1909 Forest Park ATP T-3

CITY Balt STATE Md ZIP CODE

DATE 1-21-80

FEDERAL EXPRESS SERVICES CORP.
AN FXSC COMPANY
DRAWER-DRAWEE

:061100790: 114504323 4#

74

DATE 1-23-80 DEPOSIT CODE 1-2

SALISBURY DOCUMENT 3

January 21, 1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Salisbury

DATE DEPOSIT CODE

1909 FOREST PARK ATP T-3
(address)

" BALTIMORE MARYLAND

SANDERS DOCUMENT 5

DATE 1/14/80 DEPOSIT CODE 1 1-1

AH. 1. P. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

Balt

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 74 SUM 25 DOLS 00 CTS

TO THE Priest Fr. LaRuche

David Sanders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders

⑈1020⑈000⑆155 ⑈467316467⑆⑈

Salisbury Document (1), being a money order unaccompanied by separate documentation, requries the actual signature of the contributor for matching purposes (though not for negotiability). Since CFL has submitted Document (1) without an accompanying attribution, it is representing that Document (1) contains the actual signature of Kevin Salisbury.

Salisbury Document (2) is a money order accompanied by Document (3) acknowledging the contribution. Since accompanied money orders do not require signatures for any purpose, Document (2) is irrelevant for the purpose of determining whether the Salisbury signatures are genuine.

On the other hand, Document (3), which is the required documentation confirming unsigned money orders, does contain a required signature and is therefore the relevant document to compare with (1). By its submissions, CFL has represented that Documents (1) and (3) are signed by the same person.

Again recognizing that we have no expertise to definitively judge signature validity, it appears to the untrained eye that the signatures on (1) and (3) are different with respect to the formation of almost every letter in the first and last name. It is our opinion, therefore, that there is reason to believe that Documents (1) and (3) may have been signed by two different people.

D. The "Harold H. Harrison, M.D." Contribution.

The Audit Division referral contains copies of two documents submitted to evidence the $250.00 contribution of a Harold H. Harrison, M.D. These documents are reproduced below as Harrison Documents (1) and (2).

HARRISON DOCUMENT 1

DATE 1-15-80 DEPOSIT CODE 1-2

D

Maryland national bank
BOX 987 BALTIMORE, MARYLAND 21203

CASHIER'S CHECK

7-16
520

NC 414 34412

JANUARY 11, 1980

PAY TO THE ORDER OF C.F.L. * $250.00

14 MARYLAND NATIONAL $250 AND 00 CTS DOLLARS

CASHIER'S CHECK

CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANAHA FREEMAN, C.F.L. rep.)

Kathleen C. Floyd
AUTHORIZED SIGNATURE

⑆441224⑈ ⑆052000168⑆ 002⑈002 4⑈ 91

DATE 1-15-80 DEPOSIT CODE 1-2

HARRISON DOCUMENT 2

January 23 1980
(date)

5-23

I contributed $ 250.00 to Citizens for Larouche on

January 15 1980
(date)

signed David A Harrison MD
(signature)

3904 Charles St
(address)

Balt Md 21218
(City) (state)

Document (1) is a cashier's check. The only signature required on a cashier's check is that of the bank's authorized representative. In fact, the person who purchases a cashier's check need not even be identified on the check for negotiability purposes. Therefore, the only item that the bank would have to fill in would be the amount of the check. However, individual bank practices may dictate that a bank would fill in the date and the name of person requesting the cashier's check. In the instant case, the cashier's check contains the notation "CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)". This notation appears to have been made with two different typewriters. It appears that the notation may originally have read, "CUSTOMER REQUEST BY: DEBRA HANANIA FREEMAN." It looks as if a different typewriter was used to type the remaining words which, together with the original notation, create a different meaning than the original notation. The added words imply that the customer request was made by a Dr. Harold Harrison instead of by Debra Hanania Freeman, that the check was to be merely picked up by instead of requested by Ms. Freeman, and that Ms. Freeman was a "C.F.L. rep.". This office is of the opinion that there is reason to believe that the only words the bank probably would have typed would be the phrase "CUSTOMER REQUEST BY: DEBRA HANANIA FREEMAN". If this notation were made by the purchaser or by some other individual, it does not seem that there would be any purpose in noting that someone was or was not a "customer". On the other hand, it would make sense that a bank would often wish to make some notation in the lower left hand corner of <u>its</u> checks (like people do with their <u>own</u> checks) to indicate the reason why the cashier's check was being issued, including whether or not the requestor was a "customer". However, the apparently added notations would seem to have little or no relevance to the bank; this is especially true of the identification of Ms. Freeman as a "C.F.L. rep.". Even if one assumes that a Dr. Harrison was a customer of the bank, made a request for cashier's check (after it had originally been requestd by a Ms. Freeman), and told the bank to hand the check over to someone else whose full name was Debra Hanania Freeman, it is not apparent why either this Dr. Harrison or the bank would feel compelled to identify and note on the check the occupation of the person picking up the check. This office therefore feels that there is reason to believe that someone other than the bank typed in the extra words which changed the meaning of the bank's original notation. Furthermore, from the appearance of the typed words, we believe there is reason to suspect that the added words may not have been added to the original cashier's check (which would find its way back to this issuing bank) but to a photocopy of the cashier's check which could then have been copied again after the new words had been added to the first copy. This would produce the greater distortion observable on the original typing as compared to lesser distortion on the added typing, because the more times a document is photocopied, the more the type is distorted. For all of the above reasons, this office feels that there is currently reason to believe that the information contained on the face of the copy of the cashier's check which C.F.L. submitted to the Commission may be false in part.

With respect to Harrison Document (2), it contains the only sample we have of a signature of Harold H. Harrison, M.D., and we are therefore unable to determine whether or not there is reason to believe it is bogus by comparison with another purported signature of the same individual. While there are some similarities between the Harrison signature and the signature of a "Mary Cavanaugh" on an unrelated contribution check, we are not prepared to recommend at this time that there is reason to believe that one or the other signatures is not genuine. The Audit Division referral also notes that Baltimore telephone information discloses no telephone number, listed or unlisted, for a Harold H. Harrison, but does disclose a listing for an F. E. Harrison and Bertha Harrison at 3900 N. Charles Street in Baltimore, the address attributed to Harold H. Harrison by Harrison Document (2).. While it may at first seem strange that a physician would have no telephone listing in the white or yellow pages, he could well be the son of the couple listed at 3900 N. Charles and could be doing his residency while living at home. For all these reasons, we feel that there is not currently reason to believe that Harrison Document (2) contains a forged signature or that Harold H. Harrison does not exist.

E. Handwriting Similarities Among Different Contributor's Instruments and Documentation

The Audit Division referral sets forth numerous documents which it believes contain distinctive similarities in handwriting style, which style appears to the untrained eye to be the same as that of Debra Hanania Freeman, aka Dr. Debra F. Hanania, aka Debra Hanania (hereinafter "Hanania").

One may begin with the safe assumption that signatures and other handwriting which appears on Hanania's own personal checks were indeed made by Hanania herself because the personal checks would have to be negotiated based on her bank's signature comparison. Reproduced below are personal checks bearing her signatures and other handwriting.

DATE 1-14-80 DEPOSIT CODE 1-11

DEBRA J. HANANIA
4004 LINKWOOD ROAD
BALTIMORE, MD. 21210

146

10 Jan 19 80

P.3

pay to the order of CFL $ 400 00

four hundred and 00 dollars

First National Bank BALTIMORE

for

Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 19 77

7-16
520

Pay to the order of Citizens for LaRouche $ 50.00

fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo Pol — Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO 999

7-16
520

9 Nov 19 77

Pay to the order of Citizens for LaRouche $ 40.00

forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo — Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

7-16
520

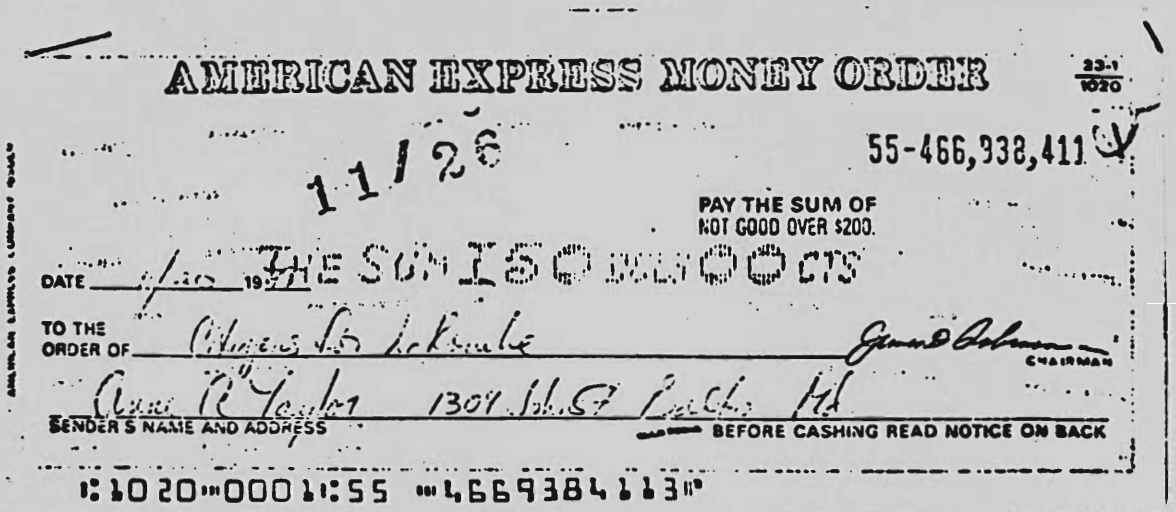
Pay to the order of Citizens for LaRouche $ 15.00

Fifteen and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo — Debra J. Hanania

While the Audit Division referral discusses a number of writings, including the signatures of others, which it believes may have been made by Hanania, we limit our consideration to those writings which both purported to be and, pursuant to matching fund regulations, are required to be signatures of persons other than Hanania. Copies of these signatures are reproduced below.



AMERICAN EXPRESS MONEY ORDER

11/26

55-466,938,411

PAY THE SUM OF NOT GOOD OVER $200.

DATE ____ 19__ THE SUM OF ONE HUNDRED DOLLARS 00 CTS

TO THE ORDER OF Citizens for LaRouche

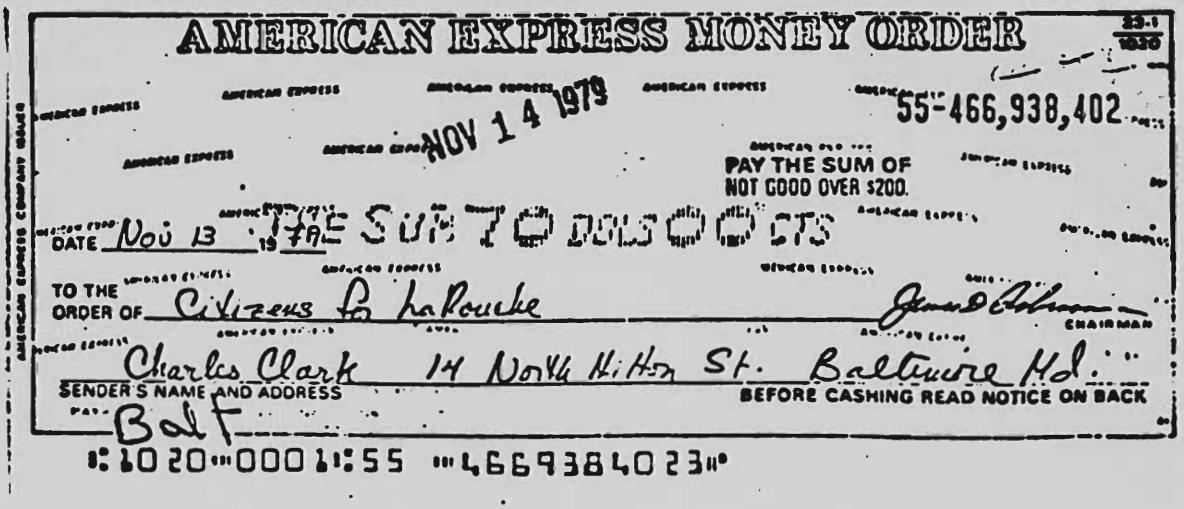
Jeremiah Chairman

Ann M Taylor 1309 N.W. St Balto Md

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑆1020⑆0001⑆55 ⑈4669384113⑈



AMERICAN EXPRESS MONEY ORDER

NOV 14 1979

55-466,938,402

PAY THE SUM OF NOT GOOD OVER $200.

DATE Nov 13 19 78 THE SUM OF ONE HUNDRED DOLLARS 00 CTS

TO THE ORDER OF Citizens for LaRouche

Jeremiah Chairman

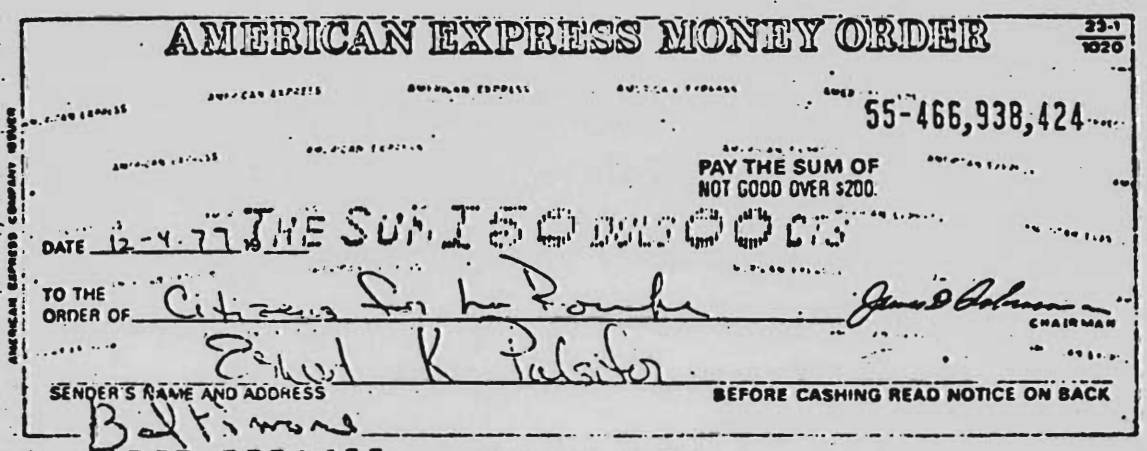
Charles Clark 14 North Hilton St. Baltimore Md.

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Balt

⑆1020⑆0001⑆55 ⑈4669384023⑈



AMERICAN EXPRESS MONEY ORDER

55-466,938,424

PAY THE SUM OF NOT GOOD OVER $200.

DATE 12-4-77 19 THE SUM OF ONE HUNDRED DOLLARS 00 CTS

TO THE ORDER OF Citizens for LaRouche

Jeremiah Chairman

Ethel K Polsinelli

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Baltimore

⑆1020⑆0001⑆55 ⑈4669384248⑈

FEDERAL EXPRESS MONEY ORDER

113833058

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

PAYABLE TO Citizens for LaRouche

NOT VALID OVER $500.00

FROM David Sanders

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

FEDERAL EXPRESS SERVICES CORP. AN NCC COMPANY DRAWER-DRAWEE

:061100790: 113833058 74

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

Balt.

PAY THE SUM OF NOT GOOD OVER $200.

DATE 1/3 1979 SUM 25 DOLS 00 CTS

TO THE Citizens For LaRouche

David Sanders 613 St.Ann St. Balt. Md. 21205

SENDER'S NAME AND ADDRESS

David Sanders

BEFORE CASHING READ NOTICE ON BACK

:1020:000:55 :467316467:

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.

DATE Jan 12, 1980

PAY TO THE ORDER OF Citizens for Labouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3857 75-1140003

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FAIRMONT

Kevin Salisbury 1909 N Forest Pk Ave

PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

:091900533: 189 2957627?" 90 Balto Md

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for Labouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 215250.005

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FAIRMONT

Nancy Radcliff 3215 N Charles - Balto 21218

PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

:091900533: 189 2926722" 90

There are other documents in the Audit Division referral which bear sufficient similarity to the Hanania writing that an expert might be able to attribute to the same person, but we are presenting only those which are so physically similar in appearance to the layman's eye that it appears there is a possibility that they were signed by the Hanania. 2/ A detailed discussion of the apparent physical similarities is set forth in the Audit Division referral. Attachment I.

It is our opinion that at least with respect to the comparison documents reproduced herein, the degree of physical similarity among the signatures indicates there is reason to believe that they may have been written by Hannania.

II. LEGAL ANALYSIS

Forgery is not per se an offense over which the Commission has jurisdiction. However, signature forgery, in some instances, does constitute an offense enforceable by the Commission. 2 U.S.C. § 9042(c)(1) provides, in part, as follows:

> It is unlawful for any person knowingly and willfully - (A) to furnish any false, fictitious, or fraudulent evidence, books, or information to the Commission under this chapter [the Presidential Primary Matching Payment Account Act], or to include in any evidence, books, or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this chapter . . . .

Although § 9042(c) provides for criminal penalties, it is encompassed within the Commission's civil enforcement authority over violations of chapter 96 of the Internal Revenue Code of 1954, of which § 9042 is a part. Regardless of whether § 9042 is being enforced civilly or criminally, however, it still requires that a person knowingly and willfully furnish the false information to the Commission. While we have earlier indicated, as a factual matter, that there is reason to believe that many of the signatures on submission documents may not have been genuine (and therefore "fraudulent evidence"), we do not yet have any evidence which would provide reason to believe

---

2/ This is not to say that the other money orders referred by the Audit Division as Attachment 5 were not by Hanania. They may in fact be more, only successful attepts at forgery; an expert will be able to make this determination.

that C.F.L or its treasurer knew that any of the signatures were bogus. We also do not have enough evidence concerning the nature and extent of the relationship between Hanania and C.F.L. to allow us to determine whether her willful involvement and knowledge, if proven, could be legally attributed to C.F.L. in satisfaction of the "knowingly and willfully" element of the statute with respect to proceeding against C.F.L. itself.

We do however conclude that there is reason to believe that Hanania may have knowingly and willfully, furnished false information and evidence to the Commission, through C.F.L., with respect to the purported contributions of Harold H. Harrison, M.D., David Sanders, Nancy Radcliff [sic], Kevin Salisbury, Anne R. Taylor, Charles Clark, and Ernest K. Pulsifor, by apparently signing their names herself while representing that they were actual signatures, except in the case of Harold J. Harrison, M.D., where Hanania may have furnished false information by the altering the face of a cashier's check or copy thereof. The wording of Section 9042(c) includes any person who submits false information to the Commission. We are therefore recommending reason to believe that Hanania violated Section 9042(c). Our investigation of Hanania's activity may develop evidence that C.F.L. is also in violation of this provision.

The other relevant statute with respect to the possible activities of Hanania is 2 U.S.c. § 441f which provides:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

It must first be clearly understood that forging someone else's signature on a submission document does not, by itself, constitute a violation of § 441f by the forger. If the "contribution" did indeed come from the person whose signature is forged, neither the forger nor the contributor has violated § 441f, because the person who made the contribution is identified even though by means of a forgery. The section <u>is</u> violated, however, if the contribution actually came from a person other than the person identified as the contributor. The forgery itself is not legally sufficient in a proceeding under this section. The Commission would ultimately be required to prove that the respondent made the contribution and attributed it to someone else; in other words, the Commission would have to prove that the <u>money</u> did not come from the person who is identified as the contributor.

With respect to Hanania, we conclude that there is a reason to believe that she violated § 441f by making a $250.00 contribution in the name of Dr. Harold Harrison, since it appears that

she purchased the money order involved and altered the information thereon to create the appearance that it had been purchased by a Dr. Harold Harrison.

With respect to all of the remaining documents for which we felt there is reason to believe that they were signed by Hanania, we do not think there is sufficient evidence at this time to give reason to believe that Hanaina, or someone other than the person designated, made the contributions themselves.

We also do not feel there is sufficient evidence to find reason to believe that C.F.R. knowingly accepted any contributions in the name of another or than any of the individuals whose names we suspect may have been signed by Hanania not only did not make the actual contribution but also knowingly permitted their names to be used to indicate that they had made contributions.

RECOMMENDATIONS

1. Find reason to believe that Debra Hanania Freeman, aka Dr. Debra J. Hanania aka Debra Hanania, may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by falsifying contributor information and documentation submitted to the Commission for matching under 26 U.S.C. Chapter 96 and by contributing $250.00 in the name of Dr. Harold Harrison.

2. Approve and send the attached letter.

Attachments

Audit Referral Memorandum
Proposed letter to respondent

ATTACHMENT #1
page 2

Pay to the order of Citizens for LaRouche.

[signature]

CITIZENS FOR LaROUCHE
CITIBANK

Date 1/23/90

Code 1-3

ATTACHMENT #1
page 3

January 22, 1980
(date)

I contributed $ 1,029.58 to Citizens for Larouche on

January 22, 1980
(date)

David Sanders
(signature)

613 St. Anns Ave
(address)

Baltimore, Md.
(City) (state)

Lenore Sanders (spouse)

David Sanders
613 St. Anns Ave
Baltimore Md.

ATTACHMENT # 1
page 4

FEDERAL EXPRESS MONEY ORDER

113833058 44/6

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens Co Operative

NOT VALID OVER $500.00

FROM David Sanders

PURCHASER'S SIGNATURE

PURCHASER

FEDERAL EXPRESS SERVICES CORP.
AN NCC COMPANY
DRAWER - DRAWEE

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

:061100790: 113833058 74

V

ATTACHMENT #1
page 5

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

ATTACHMENT #1
page 6

DATE 1/9/80 DEPOSIT CODE 1-1

Att. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 84 SUM 25 DOLS 00 CTS

TO THE Printing Fac. LaPlata

David Sanders 613 St. Ann St. Balt. Md. 21215
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders

⑈1020⑈0001⑆55 ⑈467316467⑆⑈

ATTACHMENT # 2
page 1

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 $250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF MINNEAPOLIS

Nancy Radcliff
PURCHASER, SIGNER FOR DRAWER

3215 N Charles · Balto 21218
PURCHASER'S ADDRESS

⑆091900533⑆189 2926722⑈ 90

ATTACHMENT #2
page 2

NANCY RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE MD. 21218

NO. 234

December 3 19 79 7-89/520

PAY TO THE ORDER OF CFL $ 20.00

Twenty and no/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy Radcliffe

12-11-79 1,1

B.d.t NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 208
BALTIMORE, MD. 21218

NO. 235

December 3 19 79 7-89/520

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty Five and no/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy B. Radcliffe

ATTACHMENT #3
page 1

Sample
D 5-03

DATE 1-15-80 DEPOSIT CODE 1-2

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.

DATE Jan 12, 1980

PAY TO THE ORDER OF Citizens for Albuquerque

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3857 735 140.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARMINGTON

Kevin Salisbury 1909 N Forest Pk Ave

PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

⑆091900533⑆189 2957627⑈ 90 Bldg Mgr

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #3
Page 2

FEDERAL EXPRESS MONEY ORDER

114504323 64-79/611

PAY THE SUM OF FOUR HUNDRED FIFTY AND 00/100 DOLLARS

PAYABLE TO Citizens for LaRouche
READ NOTICE ON BACK

NOT VALID OVER $500.00

FROM Kevin C. Salisbury
PURCHASER'S SIGNATURE

PRESIDENT

ADDRESS 1909 Forest Park ATP T-3

FEDERAL EXPRESS SERVICES CORP.
AN FDC COMPANY
DRAWER - DRAWEE

CITY Balt STATE Md ZIP CODE _____ DATE 1-21-80

⑆061100790⑆ 114504323⑈ 74

DATE 1-23-80 DEPOSIT CODE 1-2

January 21, 1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Salisbury

DATE _____ DEPOSIT CODE _____

1909 FOREST PARK ATP T-3
(address)

BALTIMORE MARYLAND

16

ATTACHMENT #4
page 1

DATE 1-15-80 DEPOSIT CODE 1-2

yland national bank
X 987 BALTIMORE, MARYLAND 21203

CASHIER'S CHECK

7-16
520

NC 414 34412

JANUARY 11, 1980

C.F.L. * $250.00

14 MARYLAND NATIONAL $250 AND 00 CTS DOLLARS

CASHIER'S CHECK

CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)

Kathleen C. Floyd
AUTHORIZED SIGNATURE

⑆122411⑈ ⑆052000168⑆ 002⑈002 4⑈ 91

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #4
page 2

January 23 1980
(date)

5-23

I contributed $ 250.00 to Citizens for Larouche on

January 15 1980
(date)

signed Linda K Hurst MD
(signature)

3604 Charles St
(address)

Balt Md 21218
(City) (state)

ATTACHMENT #4
Page 3

DATE 1-14-80 DEPOSIT CODE 1-11

DEBRA J. HANANIA
4004 LINKWOOD ROAD
BALTIMORE, MD. 21210

146

10 Jan 19 80

7-11/520
Branch

P.3

pay to the order of CFI $ 400 00

four hundred and 00 dollars

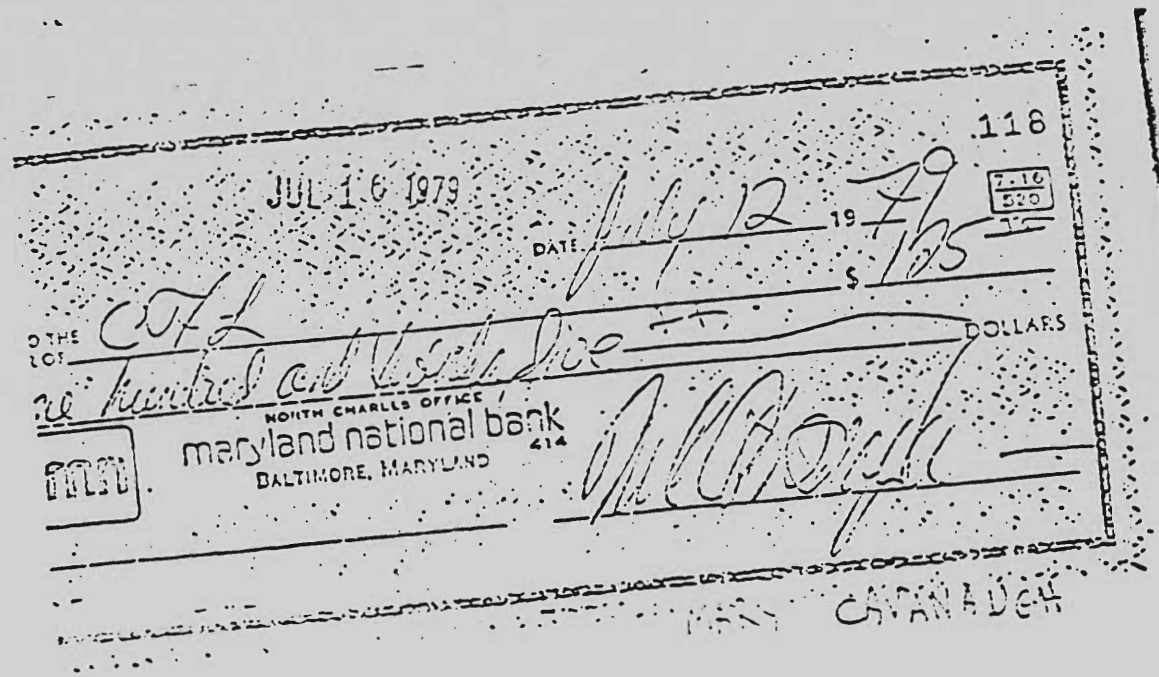
First National Bank BALTIMORE

Debra J. Hanania

for

1:

ATTACHMENT #4
Page 4


118
JUL 16 1979
7-16
520
DATE July 12 19 79
$ 185
TO THE ORDER OF CFL
One Hundred and Eighty Five DOLLARS
NORTH CHARLES OFFICE
maryland national bank
BALTIMORE, MARYLAND
414
MARY CAVANAUGH

ATTACHMENT #4
page 5

Equitable Trust Bank

PERSONAL MONEY ORDER

5190230 2 7-89 520

DATE Sept 1 1979

PAY TO THE ORDER OF CEI

NON-NEGOTIABLE

SIGNATURE Terry

FOR:

ADDRESS Village of Brookeys

ONE HUNDRED FIFTY AND 00/100 DOLLARS Best Times $150.00

1

p.5

ATTACHMENT #4
page 6

Equitable Trust Bank

PERSONAL MONEY ORDER

5190226 0 7-69 520

SEP 14 1979

DATE Sept 14 1979

PAY TO THE ORDER OF Citizens for La Rouche 01

SIGNATURE William Salisbury

FOR: car

ADDRESS 3205 ABELL AVE

[illegible] HUNDRED FIFTY AND 00/100 DOLLARS $

⑈05190226⑈ ⑆052000896⑆ 190 0465 5⑈

4 1979 P.6

ATTACHMENT #5

page 1

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 1977

7-16
520

Pay to the order of Citizens for LaRoche $ 50.00

Fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo Bail

Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO 999

7-16
520

9 Nov 1977

Pay to the order of Citizens for LaRoche $ 40.00

Forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

ATTACHMENT #5

page 2

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

11/21 19 87

7-16
520

Pay to the order of Calvert School $ 15.00

Fifteen & 00/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

997

19 87

7-16
520

Pay to the order of

$

Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

$ 100

ATTACHMENT #5
page 3

CITIZENS FOR BAROUCHE
P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

3

Name of contributor Anne R Taylor
Address 1304 Saba St
City Balt State Md Zip
Amt. of contribution 150.—
Contributor's occupation retired
Place of employment
Address
CFL Representative DHF/ESTH

AMERICAN EXPRESS MONEY ORDER 23-1 1020

11126

55-466,938,411

PAY THE SUM OF
NOT GOOD OVER $200

DATE Jan 19 THE SUM OF ONE HUNDRED FIFTY DOLLARS

TO THE ORDER OF Citizens for Barouche

Anne R Taylor 1304 Saba St Balt Md

SENDER'S NAME AND ADDRESS

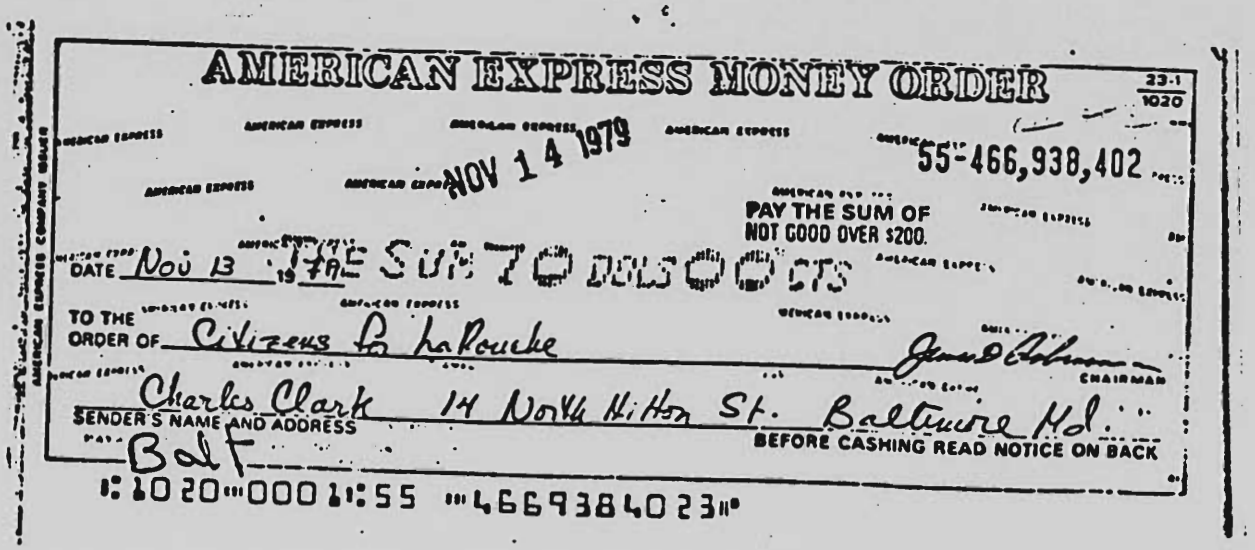
James Coleman
CHAIRMAN

BEFORE CASHING READ NOTICE ON BACK

⑆1020⑆0001155 ⑆669384113⑈

ATTACHMENT #5

page 4



AMERICAN EXPRESS MONEY ORDER

23-1
1020

NOV 14 1979

55-466,938,402

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 13 19 78 ONE SUR TO DOLLARS CTS

TO THE ORDER OF Citizens to LaRouche

CHAIRMAN

Charles Clark 14 North Hilton St. Baltimore Md.
SENDER'S NAME AND ADDRESS

Balt

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000⑆55 ⑈4669384023⑈

4

T

✓

DATE 1-23-80 DEPOSIT CODE 1-2

ATTACHMENT #5, page 5

FEDERAL EXPRESS MONEY ORDER

119851804 64-79 611

PAY THE SUM OF 50-008 $100.00

PAYABLE TO Citizens For LaRouche
READ NOTICE ON BACK

NOT VALID OVER $500.00

FROM Steven C. Warm
PURCHASER'S SIGNATURE

ADDRESS 310 Ridgemede Rd.

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE

:061100790: 119851804# 74

DATE 1-23-80 DEPOSIT CODE 1-2

JANUARY 22 1980
(date)

I contributed $100.00 to Citizens for Larouche on

JANUARY 22 1980.
(date)

signed

Steven G. Warm
(signature)

DATE DEPOSIT CODE

310 RIDGEMEDE ROAD
(address)

BALTIMORE MARYLAND

27

DATE 1-23-80 DEPOSIT CODE 1-2

ATTACHMENT #5, page 6

FEDERAL EXPRESS MONEY ORDER

119851803 64-79/611

50-008 400.00

PAY THE SUM OF

PAYABLE TO Citizens for LaRouche

NOT VALID OVER $500.00

FROM Belinda F deGrazia

FEDERAL EXPRESS SERVICES CORP. DRAWER - DRAWEE

ADDRESS 310 Ridgemede Rd

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80.

:061100790: 119851803 74

Sample 5.03

DATE 1-23-80 DEPOSIT CODE 1-2

JANUARY 22, 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22, 1980.
(date)

signed

Belinda F. deGrazia

DATE DEPOSIT CODE

310 Ridgemede Road
(address)

28 Baltimore Maryland 2

ATTACHMENT #5

page 7

12-4-79, 1-1

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-466,938,424

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 12-4-79 THE SUM OF 150 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Ivy Bowles

James D Johnson
CHAIRMAN

Ethel K Pelsinger

SENDER'S NAME AND ADDRESS

Baltimore

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈ 000 61:55 ⑈4669384248⑈

29

ATTACHMENT#5

page 8

FEDERAL EXPRESS MONEY ORDER

111280293 64-729/611

PAY THE SUM OF 50 14 FEDERAL EXPRESS 25 [illegible] 00

PAYABLE TO Citizens for LaRouche

FROM Robert A Robinson SEP 14 1979

ADDRESS 308 E 31 St.

CITY Balto STATE Md ZIP CODE 21218 DATE 9/12/79

NOT VALID OVER $500.00

PRESIDENT

FEDERAL EXPRESS SERVICES CORP.
AN FDC COMPANY
DRAWER - DRAWEE

:061100790: 111280293" 74

01

ATTACHMENT #5

page 9

AMERICAN EXPRESS MONEY ORDER

23-1
1020

11/21

55-466,938,409

PAY THE SUM OF
NOT GOOD OVER $200

DATE 11/17 19__ THE SUM 45 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Lyndon LaRouche

CHAIRMAN

[illegible] Charli - 4 Tees Ct Baltimore, Maryland 21221

SENDER'S NAME AND ADDRESS

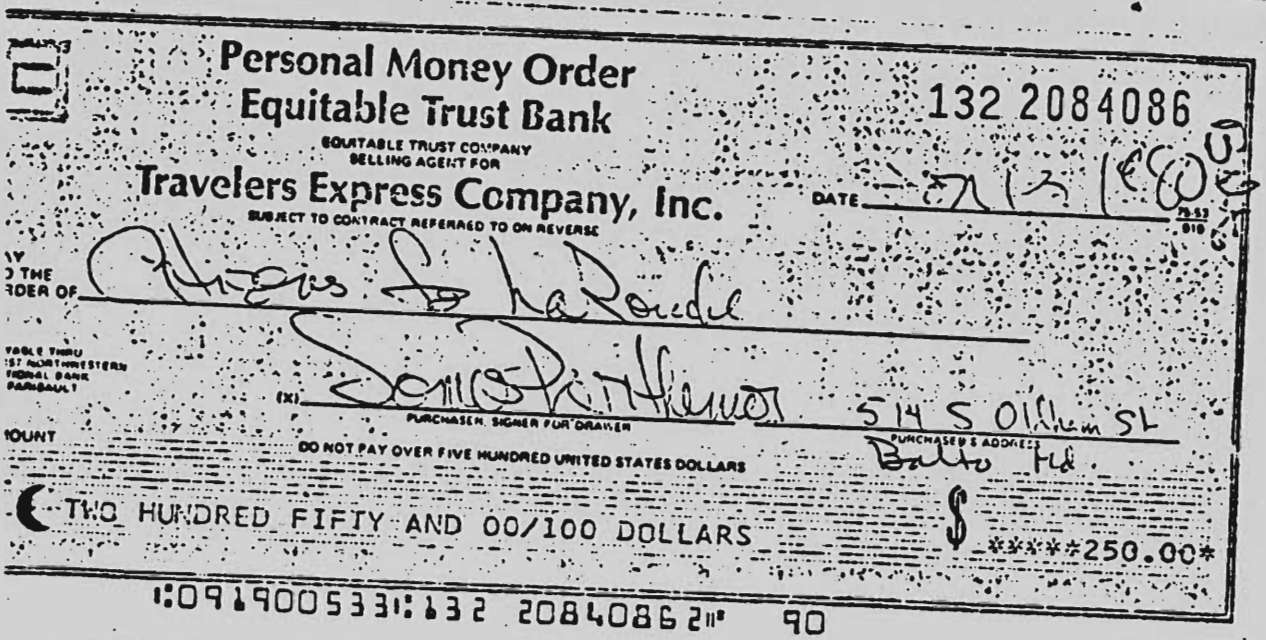
BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈ 000⑆55 ⑈4669384095⑈

AMERICAN EXPRESS COMPANY ISSUER

ATTACHMENT #5
page 10

DATE 1-15-80 DEPOSIT CODE 1-2



Personal Money Order
Equitable Trust Bank
EQUITABLE TRUST COMPANY
SELLING AGENT FOR
Travelers Express Company, Inc.
SUBJECT TO CONTRACT REFERRED TO ON REVERSE

132 2084086

DATE 1-15-80

PAY TO THE ORDER OF Andrews & LaRoche

(X) James P. Hewes

PURCHASER, SIGNER FOR DRAWER

514 S Oliver St

PURCHASER'S ADDRESS Balto Md.

DO NOT PAY OVER FIVE HUNDRED UNITED STATES DOLLARS

TWO HUNDRED FIFTY AND 00/100 DOLLARS $ *****250.00*

:0910900533: 132 2084086 2" 90

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #5
page 11

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Constantine Philios
Address Sweet Air Rd.
City Baldwin State Md. Zip
Amt. of contribution $ 225
(If contribution is $100 or more fill out below)
Occupation iconoccographer
Place of employment see above
Address

1-21-80 1-1
DATE DEPOSIT CODE

FEDERAL EXPRESS MONEY ORDER
119691496 64-79/611

PAY THE SUM OF FEDERAL EXPRESS 225 DOLS 00 CTS
NOT VALID OVER $500.00
PAYABLE TO Citizens for LaRouche
FROM Constantine Philios - Constantine Philios PRESIDENT
PURCHASER'S SIGNATURE
FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE
ADDRESS Sweet Air Rd.
CITY Baldwin STATE Md. ZIP CODE DATE

:061100790: 119691496 74

1-21-80 1-1
DATE DEPOSIT CODE

Attachment #6

Name	Date	Amount	American Express Money Order Number
Charles Clark	11/13/79	$ 70.00	55-466,938,402
Edward St John (not attached)	11/15/79	20.00	55-466,938,403
Rustom Ghandi	11/17/?79?	45.00	55-466,938,409
Anne R. Taylor	11/20/79	150.00	55-466,938,411
Arthur Murphy (not attached)	11/21/79	100.00	55-466,938,416
Ernest K. Pulsifer	12/4/79	150.00	55-466,938,424

MUR1158 Gross CTR 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1980

MEMORANDUM

EXECUTIVE SESSION
FEB 6 1980

TO: THE COMMISSION

THROUGH: ORLANDO B. POTTER OBP.
STAFF DIRECTOR

FROM: BOB COSTA RJC

SUBJECT: REQUEST BY THE CITIZENS FOR LAROUCHE COMMITTEE

On Thursday, January 31, 1980, the Audit Division received a telephone request from the Citizens for LaRouche committee for a postponement of the threshold audit which was originally scheduled to commence on Monday, February 4, 1980.

The reason given the Audit staff for the postponement was that the Committee was in the process of seeking new office space and, consequently, did not have space available for the auditors. We were further advised that the Committee is currently reviewing three alternatives as possible new locations. The Committee anticipates their move to be completed as early as February 15, 1980, but no later than the end of the month, and further believes that a rescheduling of the audit to commence in the early part of March would be reasonable.

The Audit Division has received similar postponement requests from other Presidential Candidates. In particular, we have received and granted requests from the Reagan, Kennedy, and Dole campaigns, and are currently in the process of setting a date for commencement of the Anderson audit. However, given the fact that matching fund submissions received to date from the LaRouche Committee are currently the subject of MUR action by the Commission, we are herewith recommending that the Committee be notified that their postponement request has been denied, and that we will be commencing the fieldwork on Monday, February 11, 1980 (see letter attached).

Attachment as stated

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Felice Gelman, Treasurer
Citizens For LaRouche
Box 976
Radio City Station
New York, New York 10010

Dear Ms. Gelman:

This is in response to your telephone conversation with Bruce Shelton of the Audit staff on Thursday, January 31, 1980, wherein you requested a postponement of the Commission's threshold audit of your campaign, scheduled to commence on Monday, February 4, 1980.

The Commission has considered your request and at this time advises that the audit will be rescheduled to commence Monday, February 11, 1980. The Audit staff will be in contact with you prior to that date in order to arrange a convenient time to begin the entrance conference.

Should you have any questions regarding the above, please call the lead auditor or myself at (202) 523-4155 or toll free at (800) 424-9530.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER OBP
STAFF DIRECTOR

FROM: ROBERT J. COSTA RJC

SUBJECT: IRREGULARITIES NOTED DURING REVIEW OF CITIZENS FOR LAROUCHE-SUBMISSION #3 (1/1/80-1/25/80)

The Audit Division reviewed the above mentioned submission which was received on January 28, 1980. The submission contained 1,217 contributors. The Committee requested $64,631.87. A holdback was applied to Submission #3 which resulted in a certification to the U.S. Treasury on January 31, 1980 for $57,818.92 which included an adjustment due the Committee from a previous submission and a resubmission of $275.00. The total amount certified to date is $294,081.01.

Our review followed the Commission approved procedures for statistical sampling of matching fund submissions. The results of our review are summarized below. In addition, where appropriate, we have attached copies of the written instruments/ documentation presented by the Committee as part of its submissions.

A. Signature Inconsistencies

1. David Sanders 1/22/80 (date of instrument) 500.00
Lenore Sanders (contribution was split) 509.58

The Committee submitted copies of both sides of a Household Finance check made payable to David Sanders in the amount of $1,009.58. The reverse side of the check bears an endorsement over to the Committee and the contributor's signature (see Attachment #1, page 1. and 2.). The check appears to represent the proceeds of a discounted loan. In addition, the Committee submitted a copy of a statement signed by a David Sanders and his wife (Lenore) (see Attachment #1, page 3.).

The sample items (David $500 and Lenore $509.58) were questioned because even though the signature on the reverse side of the check and the signature on the additional document are the same, they differ from another signature of a David Sanders (based on the same address, presumed to be one in the same individual) on a money order (Attachment #1, page 4.), and on additional documentation (page 5.). Further, the notation at the bottom of the loan documentation (Attachment #1, page 3.) bears a striking resemblance to the signature on the money order (page 4.) and the associated documentation (page 5.). Finally, on page 6. of Attachment #1, another signature "David Sanders" may be construed to be different than the two previously mentioned. Possibly it is the same handwriting associated with Lenore Sanders on page 3. of Attachment #1.

2. Nancy Radcliff (sic) - 9/12/79 (date of instrument) $250.00

Attachment #2, page 1., is a copy of a money order submitted by the Committee on its threshold submission. This signature problem was noted when a review of money orders submitted for the state of Maryland in Submission #3 possessed the same style of handwriting. We believe this handwriting is the same as that of Debra Hanania, aka Dr. Debra J. Hanania, aka Debra Hanania Freeman, 4004 Linkwood Road, Baltimore, Maryland. Records submitted by the Committee indicate that Debra Hanania is a Committee representative for Baltimore. Further this handwriting style appears to be the same as that associated with the David Sanders documentation mentioned in A. 1. above (Attachment #1, page 3, bottom; page 4 and 5). As can be seen by comparing the signature on Attachment #2, page 1. with the signatures on Attachment #2, page 2, the handwriting is clearly different. Further, the signature "Nancy Radcliff" on the money order (page 1.) is spelled differently than the signatures on the two checks on page 2. "Nancy Radcliffe". Based on the same address, we feel it is the same individual's name. At present, we do not know which spelling is correct, only that one is incorrect.

3. Kevin Salisbury, 1/12/80 (date of instrument) $140.00

Attachment #3, page 1., is a copy of a money order (sample item Submission #3) which bears a signature "Kevin Salisbury" and address - 1909 N. Forest Pk Ave, Balto, Md. Attachment #3, page 2., is a copy of another money order (Submission #3) which has associated documentation stating that $450.00 was contributed to Citizens For LaRouche on January 21, 1980 and signed by a Kevin C. Salisbury; 1909 Forest Park ATP., T-3, Baltimore, Maryland. It is apparent from comparing the two signatures that they are quite different.

4. Harold Harrison, 1/14/80 (date of instrument) $250.00

The Committee submitted a copy of a cashier's check payable to CFL (Citizens For LaRouche) and a copy of a statement bearing a signature "Harold H. Harrison, M.D. (see Attachment #4, page 1. and 2.). The sample item (Submission #3) was questioned because of the discrepancy between the listed name "Harrison" and the bank annotated memorandum:

> "Customer Request By (same type face)
> Debra Hanania Freeman
>
> It appears that a different typewriter other than the bank's was used to further annotate the cashier's check as shown below"

14 MARYLAND NATIONAL $250 AND 00 CTS

CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HANANIA FREEMAN, C.F.L. rep.)

Further, the additional documentation (Attachment #4, page 2.) has several apparent inconsistencies:

(a) statement reads that $250.00 was contributed on January 15, 1980 versus the date on the check of January 14, 1980. January 15 is the date of deposit.

(b) records available at the Commission indicate that there is a Harold E. Harrison who is a physician residing at 5500 N. Charles St., Baltimore, MD. Also, records indicate that Bertha Harrison and F. E. Harrison reside at 3900 N. Charles St., Baltimore, MD. There is no indication based on records available at the Commission that there is a Harold H. Harrison at 3900 N. Charles St.

(c) The signature bearing the name Harold H. Harrison M.D. bears a resemblance to the signature shown on check #118 (Attachment #4, page 4.) of Mary Cavanaugh. This similarity is somewhat enhanced when a comparison is made betwen the signature of a Mary Cavanaugh on page 4. with the signature on page 5 which is different (personal money order). It should be noted that the copy of the personal money order submitted (page 5.) is a copy of the "non-negotiable" portion, not a copy of the negotiable instrument, (see page 6. for a copy (same series) of a personal money order which is "negotiable").

Summary - Section A

Items A. 1. through A.4. are the most striking examples of signature inconsistencies identified as of this date. Our review has been focused at contributions from the state of Maryland based on our initial review of sample results from Submission #3 for Maryland.

Recommendation - Section A - Signature Inconsistencies

It is the opinion of the Audit staff, based on our initial analysis, that the inconsistencies noted above warrant an expansion of our review into other states' contributions on Submission #3 and all previous submissions; therefore, we recommend a referral of this matter to the Office of General Counsel for MUR action.

B. Irregularities Relating to Money Orders From Maryland

Based on the inconsistencies noted in Section A above and handwriting similarities noted in reviewing instruments submitted for the state of Maryland, we submit the following for consideration.

As previously stated, it appears that Debra Hanania, aka Dr. Debra F. Hanania aka Debra Hanania Freeman is a Committee Representative for Baltimore. In addition, to the connection with the Harrison contribution (see Section A. item 4) and other apparent connections with Sanders (Section A. item 1); Radcliff (sic) (Section A. item 2) and Salisbury (Section A, item 3), another pattern appears evident in comparing copies of money orders submitted (see Attachment #5, pages 1 through 11). Attachment #5, pages 1 and 2 are copies of instruments submitted which are checks with Debra J. Hanania's/Dr. Debra J. Hanania's name and signature. The handwriting is distinctive in several respects:

(a) the use of the number "7" with a bar, sometimes referred to as a European 7;

(b) the "t" in Citizens has a downward slant when the t is crossed;

(c) the lower case "f" in the word for also has a downward slant when the f is crossed;

(d) the capital "D" and "J" in the signature and the "L" and "R" in LaRouche; and

(e) the slant of the handwriting.

These similarities in handwriting are present in the copies of money orders labeled Attachment #5, pages 3 through 11. Further, a pattern has been noted relating to the serial numbers of the money orders mentioned above (see Attachment #6).

In some instances there is an associated document stating that a contribution was made which contains a signature of the named individual on the money order. (See page 5 - Warm and page 6 deGrazia). The Audit staff is not in a position to verify that the signatures(on the money order and associated document) are the handwriting of the same individual; however, we also are not in a position to verify that the signatures on the documentation are genuine.

Summary - Section B

It is our opinion that the handwriting similarities plus the absence of an associated document relating to the other money orders raises the question of whether all or a number of the money orders were actually completed (signatures included) by the same individual.

Recommendation - Section B

It is the opinion of the Audit staff based on our initial review, that the similarities noted above warrant an expansion of our review into other states' contributions on Submission #3 and all previous submissions; therefore, we recommend a referral of this matter to the Office of General Counsel for MUR action.

Should you have any questions, please contact Tom Nurthen or Rick Halter on extension 3-4155.

Attachments as stated

cc: Marsha Gentner
Office of General Counsel

ATTACHMENT # 1

page 1

Date 1/23/80 Code 1-3 5-02

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

CK NO. DATE ACCOUNT AMOUNT

01/22/80 $*1,009.58 ←PAY

BALTIMORE, MARYLAND NO. 4
NOT VALID FOR MORE THAN $10,000.00

DAVID SAUNDERS

L. A. Wall

O.E.-1

ATTACHMENT #1
page 2

Pay to the order of Citizens for LaRouche.

Date: 12/31/10 Code: 1-3

CITIZENS FOR LaROUCHE
CITIBANK

1 0 1 7 3

ATTACHMENT #1
page 3

January 22, 1980
(date)

I contributed $1,029.58 to Citizens for Larouche on

January 22 1980
(date)

David Sanders
signed

David Sanders
(signature)

613 St. Ann's Ave
613 St. Ann's Ave.
(address)

Baltimore, Md.
Baltimore, Md.
(City) (state)

Lenore Sanders (spouse) David Sanders

613 St. Ann's Ave.
Baltimore Md.

ATTACHMENT # 1
page 4

FEDERAL EXPRESS MONEY ORDER

113833058

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens Co Baltimore

NOT VALID OVER $500.00

FROM David Sanders

PURCHASER'S SIGNATURE

613 St Ann Street

ADDRESS

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

FEDERAL EXPRESS SERVICES CORP
AN NDC COMPANY
DRAWER - DRAWEE

:061100790: 113833058 74

ATTACHMENT #1
page 5

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

ATTACHMENT #1
page 6

DATE 1/9/80 DEPOSIT CODE 1-1

Att. 1. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

Balt.

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 82 SUM 25 DOLS 00 CTS

TO THE Prior Fm. LaRouche

David Sanders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders.

⑆1020⑆0001⑆55 ⑈467316467⑆⑈

ATTACHMENT #2
page 1

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 215250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FAIRMONT

Irma Rakeliff

PURCHASER, SIGNER FOR DRAWER

3215 N Charles - Balto 21218

PURCHASER'S ADDRESS

:091900533: 189 2926722" 90

ATTACHMENT #2
page 2

NANCY RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 206
BALTIMORE MD. 21218

NO. 234

December 5 19 79

7-80
520

PAY TO THE ORDER OF CFL $ 20 00

Twenty and 00/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

Nancy Radcliffe

⑆052000896⑆0234⑈559 8115 6⑈

12-11-79 1,1

B.L.T. NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST. APT. 206
BALTIMORE, MD. 21218

NO. 235

December 9 19 79

7-80
520

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty five and 00/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD.

Nancy B. Radcliffe

⑆052000896⑆0235⑈559 8115 6⑈

ATTACHMENT #3
page 1

Sample
D 5-03

DATE 1-15-80 DEPOSIT CODE 1-2

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.

PAY TO THE ORDER OF Citizens for Salisbury

DATE Jan 12, 1980

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3857 73-1140007

AMOUNT

SUBJECT TO CONTRACT AS ISSUED TO ON REVERSE

PAYABLE THRU FIRST NORTHEASTERN NATIONAL BANK OF FARMDALE

Kevin Salisbury 1909 N Forest Pk Ave

PURCHASER, SIGNER FOR DRAWER

PURCHASER'S ADDRESS

⑆091900533⑆ 189 2957627 7⑈ 90 Baltimore Md 21

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #3
Page 2

FEDERAL EXPRESS MONEY ORDER

114504323 64-79/611

PAY THE SUM OF $450.00

PAYABLE TO Citizens for LaRouche

NOT VALID OVER $500.00

FROM Kevin C Salisbury

ADDRESS 1909 Forest Park ATP T-3

CITY Balt STATE MD ZIP CODE DATE 1-21-80

FEDERAL EXPRESS SERVICES CORP.
AN FXSC COMPANY
DRAWER-DRAWEE

:061100790: 114504323 4# 74

DATE 1-23-80 DEPOSIT CODE 1-2

January 21, 1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Salisbury

DATE DEPOSIT CODE

1909 FOREST PARK ATP T-3
(address)

BALTIMORE MARYLAND

ATTACHMENT #4
page 1

DATE 1-15-80 DEPOSIT CODE 1-2

yland national bank
DX 987 BALTIMORE, MARYLAND 21203

CASHIER'S CHECK

NC 414 34412

JANUARY 11, 1980

C.F.L. ********** $250.00

MARYLAND NATIONAL $250 AND 00 CTS DOLLARS

CASHIER'S CHECK

CUSTOMER REQUEST BY: Dr. Harold Harrison (to be picked up by DEBRA HAMANTA FREEMAN, C.F.L. rep.)

Kathleen C. Cloyd
AUTHORIZED SIGNATURE

41224m 105200168: 002m002 4m 91

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #4
page 2

January 23 1950
(date)

5-23

I contributed $ 250.00 to Citizens for Larouche on

January 15 1950
(date)

signed
Mark H Hansen MD
(signature)
3903 Charles St
(address)
Elk Md 2910
(City) (state)

ATTACHMENT 34

Page 3

DATE 1-14-80 DEPOSIT CODE 1-11

DEBRA J. HANANIA
4004 LINKWOOD ROAD
BALTIMORE, MD. 21210

146

10 Jan 19 80

7-11/510

P.3

pay to the order of CFL $ 200.00

four hundred and 00 dollars

First National Bank BALTIMORE

for _____ Debra J. Hanania

ATTACHMENT #4
Page 4

JUL 16 1979

118

DATE July 12 19 79

7-16
5-20

TO THE ORDER OF CTL

$ 185

one hundred eighty five DOLLARS

NORTH CHARLES OFFICE
maryland national bank
BALTIMORE, MARYLAND 414

M. O'Dell

4E

TONY CATANZARO

20

ATTACHMENT #4
page 5

Equitable Trust Bank

PERSONAL MONEY ORDER

5190230 2 7-89 520

DATE Sept 1 1989

PAY TO THE ORDER OF CEI

NON-NEGOTIABLE

SIGNATURE Tracy

FOR:

ADDRESS Village of Brooks

ONE HUNDRED FIFTY AND 00/100 DOLLARS $150.00

ATTACHMENT #4
page 6

Equitable Trust Bank

PERSONAL MONEY ORDER

5190226 0 7-6/32

SEP 14 1979

DATE Sept 14 1979

PAY TO THE ORDER OF Citizens for La Raza

01

SIGNATURE William Salisbury

FOR: Dues

ADDRESS 3205 ABELL AVE.

TWO HUNDRED FIFTY AND 00/100 DOLLARS $

⑈05190226⑈ ⑆052000896⑆ 190 0465 5⑈

4 1979 P.6

ATTACHMENT #5

page 1

DR. DEBRA J. HANANIA
14004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 1977

7-16
520

Pay to the order of Citizens for LaPlante $ 50.00

Fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

408

Memo Pol

Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO 999

7-16
520

9 Nov 1977

Pay to the order of Citizens for LaPlante $ 40.00

Forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

ATTACHMENT #5

page 2

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

7-15
520

Pay to the order of [illegible] $ 15.00

[illegible] Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo [illegible]

Debra J. Hanania

524

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

997

19 [illegible]

7-15
520

Pay to the order of [illegible] $

Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo [illegible]

$ 10

ATTACHMENT #5
page 3

CITIZENS FOR HAROLD

P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

3

Name of contributor Anne C Taylor
Address 1304 John St.
City Balt State Md Zip
Amt. of contribution 150-
Contributor's occupation retired
Place of employment
Address
CFL Representative DHF/JST

AMERICAN EXPRESS MONEY ORDER 33-1 1020

55-466,938,411

11/26

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 19 77 ONE HUNDRED FIFTY DOLLARS 00 CTS

TO THE ORDER OF Citizens for Harold

CHAIRMAN

Anne C Taylor 1304 John St Balt Md

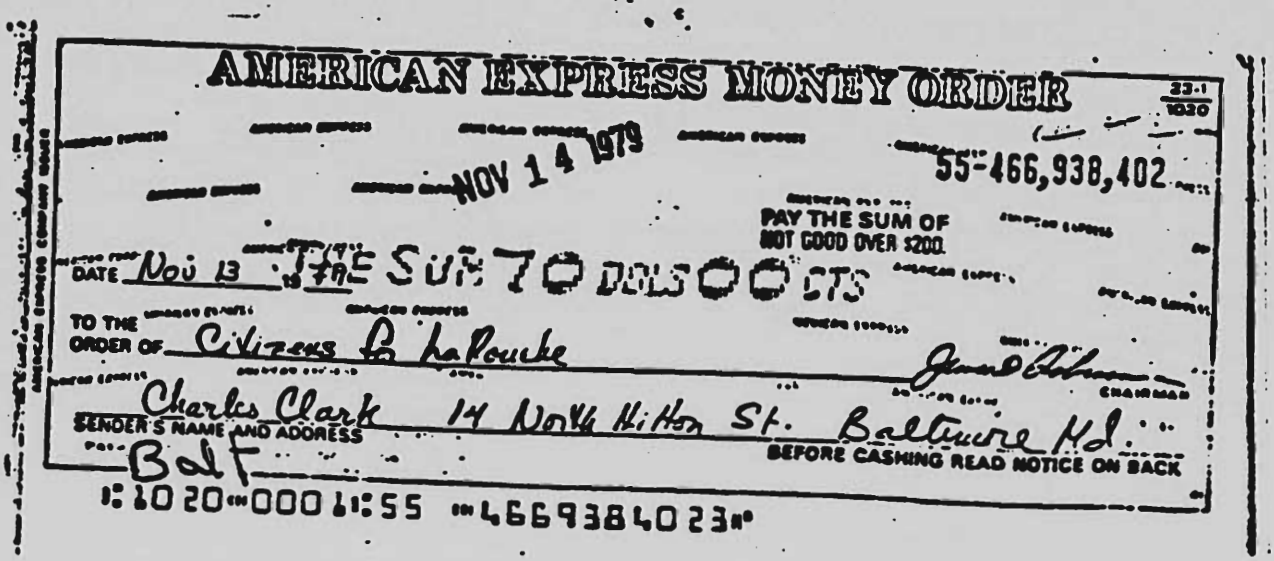
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000111155⑈466938411③⑈

ATTACHMENT #5

page 4



AMERICAN EXPRESS MONEY ORDER

33-1
1020

NOV 14 1979

55-466,938,402

PAY THE SUM OF
NOT GOOD OVER $200

DATE Nov 13 THE SUM 70 DOLS 00 CTS

TO THE ORDER OF Citizens La Rouche

CHAIRMAN

Charles Clark 14 North Hilton St. Baltimore Md.
SENDER'S NAME AND ADDRESS

Balt

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000611155⑈466938402③⑈

DATE 1-23-80 DEPOSIT CODE 1-2

ATTACHMENT #5, page 5

FEDERAL EXPRESS MONEY ORDER

119851804 64-79/611

PAY THE SUM OF 30-008 $100.00

PAYABLE TO Citizens For LaRouche — NOT VALID OVER $999.00

FROM Steven G. Warm

ADDRESS 310 Ridgemede Rd.

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

FEDERAL EXPRESS SERVICES CORP. DRAWER - DRAWEE

:061100790: 119851804# 74

DATE 1-23-80 DEPOSIT CODE 1-2

JANUARY 22 1980
(date)

I contributed $100.00 to Citizens for Larouche on

JANUARY 22 1980.
(date)

signed

Steven G. Warm
(signature)

DATE DEPOSIT CODE

310 RIDGEMEDE ROAD
(address)

BALTIMORE MARYLAND

DATE 1-23-80 DEPOSIT CODE 1-2

ATTACHMENT #5, page 6

FEDERAL EXPRESS MONEY ORDER

119851803

PAY THE SUM OF 50-006 400.00

PAYABLE TO Citizens for LaRouche NOT VALID OVER $500.00

FROM Belinda F deGrazia

ADDRESS 310 Ridgemede Rd

CITY Balto STATE Md CODE 21210 DATE 1-22-80

:061600790: 119851803# 74

Sample 3.03

DATE 1-23-80 DEPOSIT CODE 1-2

JANUARY 22, 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22, 1980.
(date)

signed

B. F. deGrazia

DATE DEPOSIT CODE

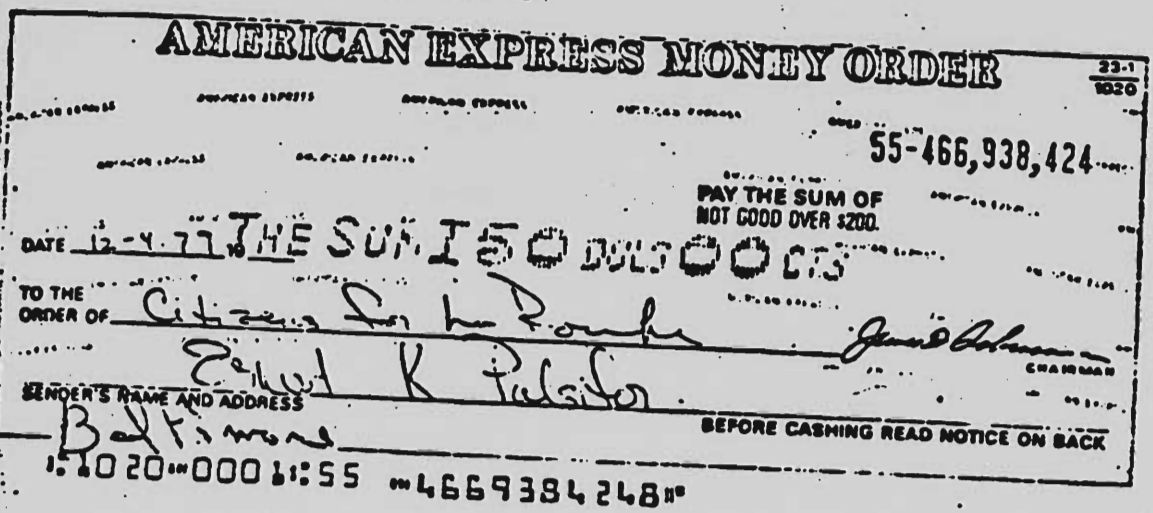
310 Ridgemede Road
(address)

Baltimore Maryland

ATTACHMENT #5

page 7

12-4-79, 1-1



AMERICAN EXPRESS MONEY ORDER

33-1
1020

55-466,938,424

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 12-4-79 THE SUM OF 50 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Ivan Rawlins

Ethel K Tolson

SENDER'S NAME AND ADDRESS

Baltimore

CHAIRMAN

BEFORE CASHING READ NOTICE ON BACK

1:0 20=000 1:55 =4669384 248=

ATTACHMENT #5

page 8

FEDERAL EXPRESS MONEY ORDER

111280293 64-779/611

PAY THE SUM OF 50 014 FEDERAL EXPRESS 25 [illegible] 00

PAYABLE TO Citizens for LaRouche

FROM Robert A Robinson SEP 14 1979

NOT VALID OVER $500.00

ADDRESS 308 E 31 St.

CITY Balto STATE Md ZIP CODE 21218 DATE 9/13/79

FEDERAL EXPRESS SERVICES CORP.
AN NDC COMPANY
DRAWER - CRANEE

:061100790: 111280293 74

01

ATTACHMENT #5

page 9

AMERICAN EXPRESS MONEY ORDER

11/21

55-466,938,409

PAY THE SUM OF
NOT GOOD OVER $200

DATE 11/17 19 THE SUM 45 DOLS 00 CTS

TO THE ORDER OF Citizens for Lyndon LaRouche

CHAIRMAN

Lyndon Charlie - 4 Jones Road Bellmore, New York 11721

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑆1020⑆0001155⑈466938409⑈

31

ATTACHMENT #5

page 10

DATE 1-15-80 DEPOSIT CODE 1-2

Personal Money Order
Equitable Trust Bank
EQUITABLE TRUST COMPANY
SELLING AGENT FOR
Travelers Express Company, Inc.
SUBJECT TO CONTRACT REFERRED TO ON REVERSE

132 2084086

DATE 1/13/80

PAY TO THE ORDER OF Andrew S. LaRoche

CR. James P. Hunter 5145 Oliver St
PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS
Baltimore MD

DO NOT PAY OVER FIVE HUNDRED UNITED STATES DOLLARS

TWO HUNDRED FIFTY AND 00/100 DOLLARS $*****250.00*

:0919005331: 132 2084086 2" 90

DATE 1-15-80 DEPOSIT CODE 1-2

ATTACHMENT #5
page 11

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Constantine Philios
Address Sweet Air Rd.
City Baldwin State Md. Zip
Amt. of contribution $ 225
(If contribution is $100 or more fill out below)
Occupation iconocographer.
Place of employment see above.
Address

DATE 1-21-80 DEPOSIT CODE 1-1

FEDERAL EXPRESS MONEY ORDER

119691496 64-79/611

PAY THE SUM OF FEDERAL EXPRESS 225 DOLS 00 CTS

PAYABLE TO Citizens for LaRouche NOT VALID OVER $500.00

FROM Christine Philios - Constantine Philios

ADDRESS Sweet Air Rd.

CITY Baldwin STATE Md. ZIP CODE DATE

FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE

:061100790: 119691496 74

1-21-80 1-1

DATE DEPOSIT CODE

33

Attachment #6

Name	Date	Amount	American Express Money Order Number
Charles Clark	11/13/79	$ 70.00	55-466,938,402
Edward St John (not attached)	11/15/79	20.00	55-466,938,403
Rustom Ghandi	11/17/?79?	45.00	55-466,938,409
Anne R. Taylor	11/20/79	150.00	55-466,938,411
Arthur Murphy (not attached)	11/21/79	100.00	55-466,938,416
Ernest K. Pulsifer	12/4/79	150.00	55-466,938,424

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1158

Date Filmed 1/7/83 Camera No. --- 2

Cameraman DPC

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1158 Depositions

Date Filmed 1-7-83 Camera No. --- 2

Cameraman SPC

81 JUL 23 AM : 20

IN RE: *
*
M.U.R. 1158 *
FEDERAL ELECTION COMMISSION *
*
* * * *

The deposition of DR. ROBERT A. ROBINSON was taken on Wednesday, July 22, 1981 commencing at 12:05 p.m. at the United States Court House, Room 820, 101 West Lombard Street, Baltimore, Maryland, 21202, before Anthony Rolland, a Notary Public.

APPEARANCES:

Robert Bogin, Esquire
On behalf of the Federal Election Commission

David B. Mitchell, Esquire
On behalf of Dr. Robert Robinson

Reported by:
Anthony Rolland

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837-3027

INDEX

WITNESS	PAGE
Dr. Robert A. Robinson	
EXAMINATION	
By Mr. Bogin	3

EXHIBITS

Commission No.	For Ident.
1	7
2	8
3	8
4	10

STIPULATIONS

It is stipulated and agreed by and between counsel for the respective parties that the reading and signing of the deposition by the witness is hereby waived.

* * * *

DR. ROBERT A. ROBINSON

called for examination by the Federal Elections Commission, having been first duly sworn according to law, testified as follows:

EXAMINATION BY MR. BOGIN:

Q Dr. Robinson, can we have your name for the record, please?

A It's Robert Alexander Robinson.

Q Dr. Robinson, that's correct to call you "doctor"? Are you a medical doctor?

A Yes, sir.

Q I'd like to ask you whether or not you're aware that there is a lawsuit pending in New York now concerning investigations that the Federal Election Commission is undertaking concerning contributions, among other things, to Citizens for LaRouche. Are you aware that there is

this proceeding in New York?

A I don't anything about it.

Q Are you here voluntarily today to give us your deposition?

A Yes. Well, at your request.

Q Right. Did anybody contact you to say that you shouldn't appear here today?

A No.

Q What's your current address?

A Home or office?

Q Both.

A Okay. My home address is 314 Broxton Road, Baltimore, Maryland, 21212.

Q And your office?

A My office address is 611 Harvey Building, Johns Hopkins Hospital, 600 North Wolfe Street, Baltimore, Maryland, 21205.

Q And how long have you lived at the Broxton Street address?

A Twenty-eight years.

Q And have you ever lived or had an address at

East 31st Street?

A No.

Q Have you ever made contributions to either Lyndon LaRouche or Citizens for LaRouche?

A Yes.

Q Do you recall how many contributions?

A One.

Q Do you recall the amount of the contribution?

A Two hundred dollars.

Q And do you recall when you made the contribution?

A Yes, the 16th of January, 1980.

MR. BOGIN: Let the record reflect that Dr. Robinson is looking at a Xerox copy of a check made out to Citizens for LaRouche for $200.

MR. MITCHELL: Let the record also reflect that the original of the check, cancelled, is on the table at the deposition.

BY MR. BOGIN:

Q Do you recall ever making any other contributions to Citizens for LaRouche?

A No.

Q Did you ever make a credit card contribution?

A No.

Q Are you married?

MR. MITCHELL: Objection. Whether he's married or not, the contribution came in his name only. I think it's only relevant that he deal with himself.

MR. BOGIN: I have some other contributions that are from a joint checking account, so I think it's relevant in that regard.

BY MR. BOGIN:

Q Are you married, Dr. Robinson?

A I'm married.

Q What is your wife's name?

A Beatrice.

Q Do you know if she ever made a contribution to Citizens for LaRouche?

A I don't know.

Q Do you have any children?

A Yes.

Q What are their names?

A One of them is Robert Alexander Robinson, Jr.;

and the other is Ann Robinson Hooker, she lives out in Colorado.

Q So it's my understanding that you have a son with the same name as yours?

A Yes. I have two other children, two girls -

Q I'm interested in the Jr. If you know, how would your son sign, for instance, his signature? In the sense, would he put Jr. on it or would he --

A Yes.

Q So it would be --

A He usually, as far as I know, uses Jr. when he signs his letters.

MR. BOGIN: I'd like to put on the record, first of all, I'd like this marked as Commission Exhibit No. 1.

(Whereupon, Commission Exhibit No. 1 was marked for identification.)

BY MR. BOGIN:

Q This Commission Exhibit No. 1 is a copy of your check payable to Citizens for LaRouche for $200. We've mentioned it and I would just ask, does that look like

A Yes, it looks like a copy of the check.

Q And it's your signature and all the handwriting on the check is yours?

A Yes.

Q I have here a check that I'm going to have marked as Commission Exhibit 2.

(Whereupon, Commission Exhibit No. 2 was marked for identification.)

Q I ask if you can at least identify the form of the check. Do you have an account like that?

A Yes.

Q Okay. Now I'd like to mark this as Commission Exhibit 3. It's a Federal Express Money Order payable to Citizens for LaRouche and signed by Robert A. Robinson. Let me mark that first and then I'll ask you if you can identify it.

(Whereupon, Commission Exhibit No. 3 was marked for identification.)

A Federal Express Money Order.

Q Dr. Robinson, is that your signature on the money order?

A No.

Q Have you ever seen the money order before?

A Well, if I have I don't remember it.

Q Is it possible this could be your son's money order?

MR. MITCHELL: Object to the possibility.

Q Let me ask you another question.

Have you seen your son's handwriting before?

A Yes.

Q Would you be able to identify his signature if he saw it?

A I think I have a pretty good memory ...

Q Does that look like your son's?

A No.

Q And it's not yours?

A It's not mine. If it is -- but I always use M.D. after my name.

Q You testified before that you only made one contribution as far as you knew of $200.

A I don't recognize this. Furthermore, the address is in New York City.

Q No, that's a Baltimore address.

A Oh. Somebody besides myself signed that.

Q And you just testified before that you don't recognize that as your son's handwriting, his signature?

A I don't know.

Q Also, just to summarize what you said before, your son when he does sign something he would put Jr. down?

A Usually, as far as I know.

Q And when you sign something you put M.D. down?

A Usually.

Q Have you ever heard of that address, 308 East 31st Street?

A I believe my son lived there at one time.

Q Just to the best of your recollection.

A I remember it was around 31st Street, the number 308 comes to mind.

MR. BOGIN: I'd like to mark this as Commission Exhibit No. 4.

(Whereupon, Commission Exhibit No. 4 was marked for identification.)

BY MR. BOGIN:

Q I have another money order, American Express Money Order for $250 payable to Citizens for LaRouche with the sender's name being Robert A. Robinson, Jr., 301 East 31st.

I ask if, first of all, have you ever seen that money order before today?

A No, I haven't seen it before.

Q Do you recognize any of that handwriting as being your son's?

A Well, that's printing, it's really not a signature.

Q Right, it's not a signature.

The address here is 301 East 31st as opposed to 308 East 31st. Does either one of those sound -- does that help you remember an address of where he might have been?

A I really don't have a good memory. I did drive down there on a couple of occasions because he was sick and I went down to see if needed some antibiotics. Number 308, I think, is the one that I remember.

Q Do you teach or work out of Johns Hopkins

University?

A Yes. I'm a full-time professor of orthopedic surgery.

Q Was your son by any chance a student at Johns Hopkins University?

A Yes, at the college.

Q During 1979, 1980?

A I think he took a night course there. He's finally finished his credits for his A.B., B.S. degree.

Q The reason I'm asking is on reports filed by Citizens for LaRouche when they list their contributors, some contributions were listed under his name and he was a Johns Hopkins student, some were listed as Robert A. Robinson and they list a physician at Johns Hopkins. There was some confusion of whether or not there are two individuals or not.

Also, there was confusion that there was a Jr. in one place and a M.D. in another place. It's part of the reason we asked you to come in.

Do you recall ever going to any fundraisers for Citizens for LaRouche?

A Maybe six years ago, but that was before he was -- before they had Citizens for LaRouche in terms of the presidential election. But it wasn't a fundraiser, either. He was just in town giving a talk down at the Lord Baltimore -- no, the Hilton, and I went down to hear him.

Q But not in 1979?

A No.

Q Do you recall any reason why you might have used a credit card for $25 to purchase or to buy anything dealing with Citizens for LaRouche?

A Well, Bobby has a Visa card that belongs to me. If he gets caught in a jam, he's got some source of funds.

MR. BOGIN: I have no further questions.

Do you have any questions.

MR. MITCHELL: No questions for the doctor.

MR. BOGIN: I have a witness fee check for $35 which is payable to you for the inconvenience and cost of attending this deposition. The Commission regrets any inconvenience that it may cause but you've been very helpful and cooperative and we appreciate your coming down.

I'd like to also put on the record that this is a confidential investigation that the Commission is undertaking and the Federal Election Commission has not made a decision to make this public, so it is a confidential deposition.

One last piece of business is you have the right to review the transcript of this deposition to check it for its accuracy. However, you may waive that right. That's up to you and your attorney to decide whether you'd like to waive it.

MR. MITCHELL: We would waive the reading of the deposition.

(Deposition concluded.)

CERTIFICATE

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Anthony Rolland, a Notary Public in and for the State of Maryland, County of Howard, do hereby certify that the within named, DR. ROBERT A. ROBINSON, appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

AS WITNESS, my hand and Notarial Seal this 27th day of July, 1981, at Baltimore, Maryland.

Notary Public

ROBERT A. ROBINSON, M. D.
BEATRICE C. ROBINSON

11/21 No. 324

Mar. 15 19 77 7-16 / 520C

Pay to the order of Citizens for La Roche $ 50.00

fifty and 00/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo _____ Beatrice C. Robinson

1-21-80 1-1

DATE _____ DEPOSIT CODE _____

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Robert A. Robinson

Address 314 Brexton Rd.

City Balt. State Md. Zip _____

Amt. of contribution $200

(If contribution is $100 or more fill out below)

Occupation Physician

Place of employment Johns Hopkins Hospital

Address Balt. Md.

1-21-80 1-1

DATE _____ DEPOSIT CODE _____

ROBERT A. ROBINSON, M.D.

NO. 7R24

1-16-1980 7-16/520

PAY TO THE ORDER OF Citizens for LaRouche $200.00

Two Hundred and 00/100 DOLLARS

JOHNS HOPKINS OFFICE
maryland national bank
BALTIMORE, MARYLAND 408

FOR A.B.C. Television Inc. Robert A. Robinson, M.D.

1-21-80 1-1

DATE _____ DEPOSIT CODE _____

C.E.P. 1-22-81

ATTACHMENT #5

Page 8

FEDERAL EXPRESS MONEY ORDER

111280293 64-729/611

PAY THE SUM OF 00014 FEDEX EXPRESS 25 00 00

PAYABLE TO Citizens for LaRouche

FROM Robert A Pedersen SEP 14 1979

PURCHASER'S SIGNATURE

NOT VALID OVER $500.00

ADDRESS 308 E 31 St.

CITY Balto STATE Md ZIP CODE 21218 DATE 9/12/79

FEDERAL EXPRESS SERVICES CORP.
AN NCC COMPANY
DRAWER - DRAWEE

:0611007901: 111280293# 74

30

C.E.3
A.R.
7/22/81

0 12 7 3 1 3 1 -

0 12 7 180

AMERICAN EXPRESS MONEY ORDER

PAY THE SUM OF
NOT GOOD OVER $1000.

04-995,186,551

DATE Feb 22 1980. THE SUM 250 DOLLARS 00 CTS

TO THE ORDER OF Citizens for LaRouche

Robert N. Robinson, Jr. 301 E 31st St. Balt Md 21218

SENDER'S NAME AND ADDRESS

PAYABLE THRU FIRST NATIONAL BANK DENVER, COLORADO

BEFORE CASHING READ NOTICE ON BACK

CHAIRMAN

C.E. 4
A.R
7/22/80

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF :

MUR 1158 :

- - - - - -

Pursuant to notice, the deposition of KEVIN SALISBURY, was taken on Friday, August 15th, 1980, commencing at 12:00 o'clock noon, at the United States Attorneys Office for the District of Maryland, 8th Floor, Federal Court House, Baltimore, Maryland, 21202, before Phyllis Goldstein, a Notary Public.

- - - - - -

APPEARANCES:

Robert I. Bogin, Esquire,
On behalf of the Federal Election Commission

Marsha Gentner, Esquire,
On behalf of the Federal Election Commission

Peter Parker, Esquire,
On behalf of Witness, Kevin Salisbury

Reported by:

Phyllis Goldstein

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

I N D E X

WITNESS:	PAGE
Kevin Salisbury	3

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

KEVIN SALISBURY,

a witness, called for examination by the Federal Election Commission, after having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MR. BOGIN:

Q Mr. Salisbury, could you give us your full name for the record, please?

A Kevin Clayton Salisbury.

Q And your address, sir?

A One Joppa Court.

Q How long have you lived at that address?

A I would say around about a month, two months.

Q And where did you live before that?

A Forest Park, 1909.

Q Is this all in Baltimore?

A Yes.

Q How long did you live at the Forest Park address?

A Around about, I don't know, around five or six years.

Q Is that your sister's house?

A My sister's? No. Their apartment is.

Q Their apartment is?

A Yes.

Q Do you remember what apartment number you lived

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

in at 1909 North Forest Park?

A T3.

Q And what is your occupation?

A Shipyard worker.

Q Are you presently employed?

A Yes.

Q What is your place of employment?

A Sparrows Point Shipyard.

Q Excuse me?

A Sparrows Point Shipyard.

Q Sparrows Point Shipyard?

A Uh-huh.

Q And, what do you do? What does your job entail?

A Carpenter.

Q How long have you been employed at this present job?

A Four years.

Q And what is the address of Sparrows Point Shipyard?

A That is the Sparrows Point Shipyard, Dundalk; that is it.

Q The address?

A That is it, Sparrows Point Shipyard, Dundalk, Maryland.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q I am showing my ignorance of the local area here. Have you ever heard of an individual named Lyndon LaRouche?

A Yes.

Q When did you first hear of him?

A I will say sometime back. I will say around about five, six years back listening to him on T.V., the news, T.V. and stuff, you know.

Q Do you know an Alan Salisbury?

A Yes.

Q Who is he? How do you know him?

A He is my brother.

Q Does he work for Lyndon LaRouche?

A I don't know much about him, as far as what he is really doing. I guess he would. I don't know. He might be working for himself. I don't know.

Q Is he associated with Citizens for LaRouche?

A I wouldn't know that either.

Q Is he involved with the media?

A I wouldn't know.

Q I have a report that he is the media director for the campaign. Have you ever heard that?

A No.

MR. PARKER: Does he live in New York?

A He lives in New York. I haven't seen my brother in four or five years.

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q When was the last time you talked to him?

A Well, four or five years.

Q You haven't talked to your brother in four or five years?

A Yes, around five. I really don't remember.

MR. PARKER: Excuse me, Charles, what is his name?

MR. BOGIN: Alan.

Q Well, I am asking you that because we think he is a media director for Citizens for LaRouche and were wondering what connection he might have had in having you know of Mr. LaRouche.

A Oh, I wouldn't know that -- you know -- you are asking me a different question. You are saying what he has to do with me knowing about him. You know what I mean?

Q So, your brother didn't tell you about Lyndon LaRouche?

A I saw him on, like television, and that is where I heard about him.

Q And this was in 1976?

A In 1976, yes, on television and as far as running across people selling papers.

Q Have you ever given a contribution to Citizens for LaRouche?

PENSAL CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q For contributions for what?

A Oh, I can't remember that.

Q No, no, but why did you give them a contribution?

A Huh?

Q Why did you give them a contribution?

A Supporting his candidacy.

Q For ...

A President.

Q So, have you given contributions in 1970 and '80?

A I can't remember.

Q You can't remember.

A No.

Q You don't remember giving money to somebody for the Citizens for LaRouche Campaign?

A I remember giving money, but I don't know exactly when I was giving money.

Q Do you remember how much?

A I don't remember how much.

Q Do you have a checking account?

A Yes.

Q Did you write a check to Lyndon LaRouche?

A I don't remember whether I have written checks or given cash or -- I do not remember.

Q Did you ever volunteer your time for his campaign?

A In what way, what do you mean?

Q In terms of helping him win, getting votes or

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

getting money. Have you ever helped in the campaign?

A Well, I don't know. If you are supporting a candidacy, I am sure you do certain things to try to assist him in winning.

Q What were those things?

A I wouldn't know as far as my contribution, you know.

Q But besides giving your contribution, have you given any of your time to help him?

A What kind of time?

Q Spare time, when you are not working; lunch time.

MR. PARKER: Like going out and knocking on doors and that kind of stuff.

Q Giving out literature.

A Oh, as far as the time I have given, as far as telling my friends and family, relatives, about the candidacy in that manner, yes.

Q Let me say something to you. We are undertaking an investigation here, and you are a witness. We have no -- there is no investigation against you or anything like that. I get the feeling that you are not being as forthcoming, not being as expressive to me as you could be. I would just like you to know that might not be the best way of handling the situation.

A In what way?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q If we can't get the information, it seems like you are keeping things from us. You should be feeling relaxed. Just tell us how you spent your time in terms of Mr. LaRouche.

MR. PARKER: I object to Mr. Bogin's characterization of the witness' testimony. I have been sitting here, and it appears to me he has been answering the questions as best he can.

Q Have you volunteered any of your time for Mr. LaRouche's campaign?

A I said yes.

Q And now tell me how. What did you do, I mean what were the things that you did in helping the candidate?

A Like I said, as far as talking with my friends and stuff and telling them about his candidacy.

Q Did you go to fund raisers for Mr. LaRouche?

A No, not that I can remember.

Q How did you make your contributions to Mr. LaRouche?

A I can't remember.

Q Did you give money to -- do you know Debra Freeman?

A Yes.

Q Did you ever give her money?

A Yes, I have given her money.

Q Cash?

A I wouldn't remember whether it was cash, check, money order. I wouldn't remember in those terms. It has

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

been sometime.

Q What about Larry Freeman.

A For Larry Freeman, I wouldn't remember.

Q You remember giving money to -- contributions to Debra Freeman; is that true? You said that before.

A (Witness moves head up and down indicating positive response.)

Q I will wait until you answer.

MR. PARKER: He nodded his head yes.

Q He nodded his head yes. Did you give money to Larry Freeman?

A I wouldn't know. I wouldn't remember.

Q Who else besides Debra Freeman did you give money to?

A I wouldn't remember. You know? That is like saying, you know, if I have given money to a hundred people, I wouldn't remember all of those hundred people, you know. I cannot remember. I have given money to a lot of people, you know. I have given money to people on my job. I have given money to my wife, my kids, my family.

Q But you remember those people.

A Yes, but I can't remember everybody. That is what I am saying.

Q When you gave money, was it for the purpose of making a contribution?

PENLAD CO., BAYONNE, N.J. 07002 - FORM 740

A I wouldn't know. I wouldn't remember, you know, as far as what purpose or anything. You know, I know sometimes I have given money for the purpose of candidacy.

Q Do you know a William Salisbury?

A Yes.

Q Who is that?

A He is my uncle.

Q Do you know if he has contributed to the Citizens for LaRouche?

A I wouldn't know.

Q Have you ever talked to him about Citizens for LaRouche or Lyndon LaRouche?

A Have I ever talked to him about it? He has talked to me about it.

Q So you have had conversations with him about it?

A Yes, I have had conversations with him.

Q Have you met Nancy Radcliffe before today?

A Who?

Q Nancy Radcliffe.

A I have met her before.

Q Do you remember where?

A I don't remember exactly where; you know, I have met her.

Q Have you ever been to LaRouche headquarters at the

PHILAB CO. BAYONNE, N.J. 07002 - FORM 740

Medical Arts Building?

A I wouldn't remember.

Q Have you ever been to the Freeman house?

A Where is the Freeman house?

Q In Baltimore. Linkwood Avenue.

MR. BARKER: Larry and Debbie Freeman's home he is talking about.

A Oh. No, I have never been there, not that I can remember.

Q We will get back to some of these questions. Maybe your memory will get better.

I have here a Traveler's Express Money Order, payable to Citizens for LaRouche, for $140. I was wondering if you have ever seen this money order before today?

A Have I ever seen that money order?

Q Before today?

A I wouldn't remember.

Q Did you purchase that money order?

A Huh?

Q Did you purchase that money order?

A Did I purchase that money order? I don't know.

Q Is that your handwriting on the money order?

A Is that my handwriting? Let me see. Nope. It don't look like my handwriting.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Is that your signature?

A It could be.

Q Come on, you know what your signature looks like. Is that your signature or not?

A No, that is not my signature.

MR. BOGIN: I would like to mark this Commission Exhibit No. 1, which is a Traveler's Express Money Order payable to Citizens for LaRouche for $140 with Kevin Salisbury's name on it, but not signed by him, No. 2957627.

A I don't know. I can't tell you by that. I probably signed for it. Do you know what I mean? But I can't tell by a photocopy and all of that. I would have to see the original. That is a photocopy, right?

Q Right, but you have never seen this before today, you have just testified.

A Oh, I probably have seen it before, you know what I mean? But I can't remember.

Q But that is not your signature on it?

A I can't tell by the photocopy if that is my signature or not.

Q I think you testified before, Mr. Salisbury, that that was not your signature. Regardless of whether it is a photocopy, it is fairly clear what your signature is. So, it is either yes or no.

A No, that is not my signature.

MR. BOGIN: Now, you may mark that exhibit.

PLOSKER CO., BAYONNE, N.J. 07002 - FORM 740

(Whereupon, the above-mentioned article was marked as Commission Exhibit No. 1, Traveler's Express Money Order No. 2957627.)

Q Do you remember signing any documentation concerning a contribution for $140?

A Well, like I said, I have signed a lot of things in contribution to money, but I do not remember what things I have signed in making those contributions for money. You know what I mean?

Q I would like to show you another document, which is -- before I get into that, I know that you have said that you don't recall, but what would you say was one of the largest contributions you ever made at one time to Citizens for LaRouche?

A I wouldn't remember.

Q Did you make $2,000 at once?

A I wouldn't know.

Q $2,000 is a lot of money. Don't you think you would know if you made a $2,000 contribution?

A I wouldn't know.

Q Why not?

A Huh?

Q Why wouldn't you know?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I wouldn't remember.

Q That strains my cred -- You know, I can't believe that.

A That could be four years ago. I spend a lot of money.

Q In the last two years, in 1979 and 1980, did just you make -- what was the largest amount -- a single contribution that you ever made?

A I wouldn't remember.

Q Was it possible that you made a $2,000 contribution?

A I wouldn't know.

Q Is that a lot of money to you, $2000?

A Is that a lot of money to me? No.

Q How much money do you make a year?

A How much money do I make a year? It all depends.

Q In 1979.

A I wouldn't know until I got my check stubs on that.

Q How much money do you make a week? What is your paycheck?

A That is a little personal how much money I make.

Q I want to know if $2,000 is a lot of money to you. It is a lot of money to me.

A It is not a lot of money, but it is personal what I make. That is my private affair what I make.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q What is your paycheck?

MR. PARKER: That is not relevant. I instruct the witness not to answer.

Q It certainly is relevant. Do you refuse to answer the question?

A Refuse to answer what?

Q To tell me how much money you make a week.

MR. PARKER: Yes.

A Yes. How much money I make is my business.

Q Is giving $2,000 in a contribution a lot of money for you?

A Is giving that -- would it be a lot of money? No, I don't consider that to be a lot of money.

Q Do you ever remember making a contribution of about $2,000?

A No, I don't remember making any contributions.

Q To the Citizens for LaRouche, what was the largest contribution you ever remember making?

A I wouldn't know.

Q Is it possible that you made a $5,000 contribution to them?

A I wouldn't know that.

Q $5,000, you wouldn't know? It seems like a lot of money for one time, not an aggregation. Just one time. Did you write out a check or get a money order for $5,000?

A One check at that time?

Q One check.

PEARSON CO. BAYONNE, N.J. 07002 - FORM 740

A One check at a time? Well, I would say I don't have that much money.

Q So it would be unusual to give such a large amount of money at that time?

A I guess so.

Q Now, try to remember we are only talking about in the last year.

MR. PARKER: Do you have anything to refresh his memory with?

MR. BOGIN: Maybe eventually.

Q In the last year, what would you say was the amount of money you contributed at one time?

MR. PARKER: He said half a dozen times he doesn't remember.

A I don't know. It could be, you know, it could be five, it could be ten, it could be 25, it could be 30, it could be 50, it could be a hundred. I wouldn't know. You know, it could be 200, you know, I wouldn't know.

Q So, $140 at one time that you gave -- that is possible that you gave that amount of money?

A Yes, six, it is possible I could have given that much money.

Q In cash? Because you didn't purchase this money order.

A I wouldn't know.

Q Well, you didn't purchase the money order? This is Commission Exhibit No. 1 which you said you didn't purchase. Did you purchase this money order, Commission Exhibit No. 1?

A I wouldn't know.

Q You wouldn't know if you purchased that?

A No.

Q But it is not your handwriting on it?

A No, that is not my signature. I might have signed for something similar to that, but that is not my signature. I might have okayed it with a signature or something. Do you know what I mean?

Q How often do you buy money orders?

A How often do I buy money orders? I wouldn't know.

Q How many times a week do you buy money orders?

A It depends.

Q It depends on what?

A Huh?

Q What does it depend on?

A It depends on if I got to pay anything or if I have got to get money for something.

Q But you said you had a checking account.

A Huh?

Q You have a checking account, so why would you need money orders?

A If I -- when I run out of checks. A lot of times I don't feel like writing out stuff. My wife will have the checking account, and I will go get a money order.

Q So you run down to the bank and get a money order?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Run down to the bank? I went to the store.

Q Which store would that be?

A Again, this is personal.

Q Excuse me?

A I think it is my business what store I go to.

Q We have a money order here that has your name on it. If you purchased it, what store would you have purchased it at?

A I wouldn't know.

Q Where is the store nearest your house? Do you go to that store?

A Several stores. It all depends on where I am at.

Q Let's say you are at work.

A If I am at work?

Q Do you ever purchase a money order from work?

A I have purchased at a store around there in that area. I wouldn't know what store.

Q What kind of store sells money orders?

A Well, you have a lot of your bars.

Q Bars sell money orders?

A Your liquor stores sell money orders, yes.

Q I have here another money order, this time it is a Federal Express Money Order made payable to Citizens for LaRouche, and it has your name on it. Have you ever seen this Federal Express Money Order before?

A Where?

Q For $450. (indicating).

A $450. That is $450?

PINCUS CO., BAYONNE, N.J. 07002 - FORM 740

Q That is right.

A Federal Express Money Order?

Q Uh-huh.

A No, I have never seen that before. I can't make it out. I wouldn't remember.

Q Where it says Kevin C. Salisbury on it, is that your handwriting?

A No, that is not my handwriting.

Q And the address, 1909 Forest Park; that is your address, but you didn't write it?

A Yes, that is my address.

Q But you didn't write it?

A No.

Q What is A-T-P? Does that mean anything to you?

A That is apartment.

Q But usually it is A-P-T.

A Well, somebody made a mistake.

Q But you didn't? I mean you wouldn't make that mistake?

A I don't know. I would probably write it that way, too.

MR. BOGIN: I would like to put in the record, Federal Express Money Order No. 114504323 into the record as Commission Exhibit no. 2.

(The above-mentioned article was marked as Commission Exhibit No. 2 for identification.)

PENNAG CO BAYONNE, N.J. 07002 FORM 740

Q Below the money order is a copy of another document which says, "I contributed $450 to Citizens for LaRouche on January 21st, 1980" and signed by you; is that your signature?

A Yes.

Q Does that look anything like the signature that is on Commission Exhibit No. 1?

A No.

Q Now, it has your address below your signature. Did you write in the address?

A Yes.

Q You did, and you spelled apartment A-T-P?

A Uh-huh.

Q But that is your handwriting?

A Looks like it.

Q But you didn't write A-T-P up on the money order?

MR. PARKER: That is what he said.

Q Okay. This money order was purchased on January 21st, 1980. Do you remember signing this document where it says you contributed $450?

A I wouldn't have remembered that.

Q You might have signed some paper, but you didn't read what it said?

A I read what it said at the time. I knew what I was doing, but I wouldn't remember. I wouldn't remember

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

that.

Q Is $450 a lot of money to you?

A Is it a lot of money to me? Yes, it is a lot of money.

Q And would you remember contributing $450 to Citizens for LaRouche?

A I wouldn't remember.

Q Why?

A Huh?

Q Why wouldn't you remember? If it happened to me, I would remember.

A That is you; it is not me. I wouldn't remember.

Q So, you don't remember contributing $450 to Citizens for LaRouche?

A No, I wouldn't remember that.

Q Is it true that you didn't contribute the $450 to Citizens for LaRouche?

A Is it true that I didn't? What do you mean?

Q Well, either you did or didn't, so did you contribute that $450 for Citizens for LaRouche?

A It appears that I did.

Q It appears, but did you?

A I have contributed a lot of money in some way or another.

Q So, do you remember giving somebody $450 in cash?

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

A I wouldn't remember that unless you brought it forward right now.

Q Well, I have a money order for $450 --

MR. PARKER: That is what he is doing, Mr. Salisbury. He is refreshing your memory by showing you that material. He is asking, did you make the contribution or not?

A Yes. I guess I would have, I don't know.

Q But you don't remember?

A I don't remember.

Q But you testified that $450 is a lot of money to you.

A I testified that $450 --

MR. PARKER: No, I don't think he testified to that.

MS. GENTNER: Yes, he did.

MR. PARKER: Earlier he said $2,000 was not a bt of money.

MS. GENTNER: If you want her to read it back, we can have it read back.

MR. BOGIN: It doesn't matter.

Q Did you ever instruct anybody to purchase a money order for you in the last two years?

A Huh?

Q Did you ever instruct anybody to purchase a money

PENNAC CO., BAYONNE, N.J. 07002 - FORM 740

order for you in the last two years?

A I wouldn't know.

Q Do you remember ever giving Debbie Freeman cash?

A I wouldn't remember.

Q I think you testified before that you did.

A Do I ever remember giving her cash?

Q Yes.

A See how my memory goes? I have given cash before, do you know what I mean? But I wouldn't remember how much I have given and stuff like that. I know I have given cash.

Q Have you made contributions to other candidates, other than Citizens for LaRouche?

A I wouldn't know that either.

Q Mr. Salisbury, do you have a selective memory?

A I don't know.

Q Do you remember only things that you want to remember?

A No, that is not it.

Q Is it usual that when I ask you questions that only took place in the last year, that you don't remember?

A Well, I do a lot of things. I have a lot of things that I occupy myself with doing, you know what I mean? And it is hard to keep track of a lot of things at one time, you know what I mean? Other than all this stuff

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

you are bringing before me, it only refreshes my mind to a certain degree, do you know what I mean?

Q We would like to take a five-minute break and come back and talk to you some more.

(There was a pause in the proceedings for a brief recess.)

BY MR. BOGIN:

Q Mr. Salisbury, do you have a subscription to New Solidarity?

A Do I have a subscription to it? What do you mean, like?

Q Do you get it?

A Do I get it?

Q Do you get it weekly, or when does it come out?

A I get it as often as I can.

Q Does it get sent to your house, or do you have to purchase it each month?

A Huh?

Q Do you have a subscription, or do you purchase it each time?

A Yes.

Q Yes, you have a subscription?

A Yes, I have a subscription.

Q How much do you pay for that?

A I wouldn't know.

Q Do you pay in cash?

A Huh?

FORM 740

Q Do you pay in cash?

A I wouldn't know.

Q Do you pay by money order?

A Sometimes by money order, sometimes by cash, and sometimes by check.

Q Where do you send the money for the New Solidarity?

A I wouldn't know that, unless I was to look in New Solidarity and get the address right off from there. The same way as right now with my car note. I would have to look in there for the address to write out for it.

MR. BOGIN: Do you have any questions, Mr. Parker?

MR. PARKER: No, no.

Q Did you have any conversations with Debbie Freeman before coming here today in the last month?

A Did I have any conversations with her? That is a personal question, isn't it?

MR. PARKER: No, you can answer that question.

Q Just answer the question yes or no.

A Yes, coming here I have had a conversation with her.

Q Did you talk about coming and giving your deposition?

A I guess so.

Q What did you talk about? Did she tell you how to answer questions?

A That is personal right there.

Q No, it is not personal.

MR. PARKER: You can answer the question.

A What we talked about -- well, what she was telling

PENNEY CO BAYONNE, N.J. 07002 - FORM 740

me is that, you know, there are questions and things, and that I will be asked a bunch of questions, and that was it. As far as what questions were going to be asked, I didn't know that.

MR. PARKER: She told you to tell the truth, didn't she?

A Yes.

Q Did she tell you to get Mr. Parker as an attorney?

A She told me that Mr. Parker would be here as an attorney.

Q But he is your attorney.

A Huh?

Q He is your attorney?

A Uh-huh.

Q How did you know to call Mr. Parker?

A What do you mean, how did I know?

MR. PARKER: She suggested it.

MR. POGIN: Please, let the witness answer.

MR. PARKER: He just said that a minute ago.

Q This is an example of your just not telling me the story.

A What do you mean? An example? Yes, she told me about Mr. Parker as far as being my attorney.

Q So she said for purposes of the Federal Election -- Commission, as a witness, you should get Mr. Parker as an attorney?

A Yes, as being an attorney.

PENNSYLVANIA BAYONNE, N.J. 07002 · FORM 740

MR. BOGIN: Okay. I have no further questions, but I would like to make a statement for the record. We have taken the deposition of Mr. Kevin Salisbury today, and though he has answered most of our questions, we are not waiving our right to call him again as a witness to testify further when we have further questions. The basis of that is that there is a feeling that he has not been entirely forthcoming with all the information that he had and maybe his memory might improve upon reflection. I would also like to advise you that there is a confidentiality provision of the Act that prohibits you from discussing this matter with anybody besides the FEC and your attorney. Are you aware of the confidentiality provisions?

THE WITNESS: Yes.

MS. GENTNER: Mr. Parker might like to respond.

MR. PARKER: No, I have no further questions.

MR. BOGIN: For purposes of this deposition, do you waive signature?

MR. PARKER: The question is Mr. Salisbury, you have a right to read and sign the deposition if you so desire. Otherwise, the person transcribing the deposition will just deliver a copy of it to Mr. Bogin. Otherwise, you have a right to read it and make sure your answers are correct, that she transcribed what you said correctly. You have that right. It is up to you.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MS. GENTNER: She will ask you to come down and read it.

THE WITNESS: Well, I would rather not sign my name to nothing since I don't know everything bacause there's a lot of things I don't remember.

MR. BARKER: You are willing to waive your signature; is that correct?

THE WITNESS: Right.

MR. BOGIN: Thank you for coming down.

(Whereupon, the witness was excused at 11:30.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, County of Baltimore, do hereby certify that the within is a true and accurate recording of the proceedings indicated.

NOTARY PUBLIC

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

'81 JUL 23 AM : 20

IN RE: :

M.U.R. 1158 :
FEDERAL ELECTIONS COMMISSION :

- - - - - -

The deposition of DIANA SAHYOUN was taken on Thursday, July 9, 1981, commencing at 3:45 p.m., at the United States Court House, 101 West Lombard Street, Baltimore, Maryland 21201, before Anthony Rolland, a Notary Public.

- - - - - -

APPEARANCES:

Robert Bogin, Esquire and
Daniel Blessington, Esquire,
On behalf of the Federal Elections Commission

Reported by:

Anthony Rolland

GORE BROTHERS REPORTING CO.
221 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837-3027

I N D E X

WITNESS:	PAGE
Diana Sahyoun	
Examination By Mr. Bogin	3

EXHIBITS

Commission Exhibit Nos.:

1	7
2	10
3	10

STIPULATION

It is hereby stipulated and agreed that the reading and signing of the within deposition by the witness be and the same is hereby waived.

- - - - - -

DIANA SAHYOUN,

called for examination, being first duly sworn according to law, testified as follows:

EXAMINATION BY MR. BOGIN:

Q Would you give us your name for the record?

A Diana Sahyoun.

Q How do you spell that?

A S-a-h-y-o-u-n.

Q What is your present address?

A 613 St. Anne's Avenue.

Q And how long have you been living at that address?

A For about six years.

Q And are you married?

A Yes.

Q And your husband's name?

A David Sanders.

Q Do you use the name Sanders?

A No.

Q Is it on any of your papers or do you use it at work?

A No, I don't.

Q Nobody knows you as Diana Sanders?

A No.

Q Have you ever heard of a Lenore Sanders?

A No.

Q Do you know anybody by the name of Lenore?

A No.

Q Have you ever made a contribution to Citizens for LaRouche?

A Not directly.

Q Do you know what Citizens for LaRouche is?

A Not really.

Q Do you know who Lyndon LaRouche is?

A Yes.

Q When did you first hear of him?

A When I met my husband about, say four years ago.

Q And in what context did you hear of him?

A Well, he was -- my husband was telling me about the U. S. Labor Party Organization and they wanted to place him as the president.

Q So he was the candidate of the United States Labor Party?

A Yes.

Q And that was in 1975?

A It was four years ago.

Q 1977?

A Something like that, yes.

Q So this was a presidential election in 1976 and there was one in 1980, so which election were they trying to make him president?

A The way I understand it they been trying probably both of them.

Q Have you given money to him at any point in time or the U. S. Labor Party?

A Four years ago, I think I donated through my husband, I think $50. That was the only money.

Q And in the last two years, let's say since 1979,

do you recall ever giving any money to Citizens for LaRouche?

A No, I have not.

Q Do you know if your husband has given any money to Citizens for LaRouche?

A I think he did, I am not sure.

Q You wouldn't know how much?

A He never tells me, no.

Q Are you currently employed?

A Yes.

Q And who is your employer?

A I work for the State of Maryland, Department of Health and Mental Hygiene.

Q Has anybody discussed your coming here today with you since you have been notified by the Commission for your appearance?

A Yes, it was somebody from the U. S. Labor Party. I think his name is John. They were trying to make me sign a paper, you know, trying to get the whole thing cancelled or not to let it go to court so they wanted me to sign it saying I gave my contributions legally. I did not

sign it because I did not give any contributions.

Q Did anybody put any pressure on you not to be here today?

A No.

Q So somebody by the name of John came by your house and asked that you sign some kind of letter?

A Yes.

Q And you didn't sign the letter?

A No.

Q I have here a check made out to David Sanders which I am going to have marked as Commission Exhibit 1.

(Whereupon, Commission Exhibit No. 1 was marked.)

Q Here is a check from Household Finance, Consumer Finance Division, which is a company that makes loans, and it's made out to David Sanders for $1009.58. Have you ever seen that check before?

A I haven't seen it but I heard about the money they needed. They needed a loan.

Q Who is they?

A The U. S. Labor Party. They needed a loan. I

think he made up -- they wanted to get the money through him.

Q Do you know how they arranged for the loan? Did your husband go get the loan?

A I think he did.

Q And do you know how he qualified for the loan?

A Probably he just applied for it for his ownself.

Q Did he have to use the car as collateral or anything like that?

A I don't know.

Q But as far as you know now he went and got the loan on his own behalf?

A This is what I think.

Q Do you know whether or not he has been paying off the loan?

A I think they pay the loan.

Q They give him the money to pay off the loan?

A Right.

Q What information do you have that that is true?

A I don't have any information that that's true. I just go by what he tells me.

Q Your husband tells you?

A They tell him they pay some amount of money and he just pay on it.

Q So he probably has to pay Household Finance on a monthly basis?

A Right.

Q And then he gets money?

A From the organization.

Q That is what he told you?

A That is what he told me. I don't know nothing for fact.

Q Do you or your husband have a checking account?

A No, we don't.

Q Do you know how he would pay off this loan? How does he make his monthly payments to Household Finance?

A I think he pays it directly. He goes to the bank and pays it directly.

Q Gives it to Household Finance?

A He goes down there. I think the place is on Charles Street.

Q So he told you he gets money from...

A From the U. S. Labor Party, they paid him, and then he takes it. That's how it goes.

Q But the only knowledge that you have is what he told you?

A That's all. I haven't seen any papers. As far as I'm concerned he could be paying it himself. I don't know.

Q I have here the back of this check which I'd like to mark as 2.

(Whereupon, Commission Exhibit No. 2 was marked.)

Q I will just show you that. It's Commission Exhibit 2, it's the back of that check endorsed to Citizens for LaRouche signed by David Sanders. Do you recognize that to be your husband's handwriting?

A Yes, I think that is my husband's handwriting.

Q And then I have a document that says -- well, let's mark this as 3.

(Whereupon, Commission Exhibit No. 3 was marked.)

Q I have Commission Exhibit No. 3 which is a piece

of paper dated January 22, 1980, and it's typed, I contributed, and there is a blank with the written in $1,009.58 for Citizens for LaRouche. On January 22, 1980. It looks like David Sanders' signature, his address and his town. And next to it is another handwriting. Do you recognize that handwriting next to your husband's handwriting?

A No, I don't.

Q Do you recognize your husband's handwriting?

A Sure, and that's not his handwriting neither. This is not David's handwriting neither and the one next to it is not my handwriting or someone I don't even know, plus the address either. Lenore Sanders, no.

Q So the handwriting on the back of this check where it says David C. Sanders and the handwriting up there--

A You're talking about this one or that one?

Q I'm talking about the signature.

A This one and this one is the same.

Q And that's your husband's?

A That's my husband's.

Q How about the handwriting?

A This one here?

Q Yes, do you recognize that at all?
A No, this is not --
Q It's not yours, is it?
A No, it's not.
Q Can you read what it says?
A No, I can't.
Q Below it says Lenore Sanders.
A Yes.
Q You testified you don't know anybody named Lenore Sanders.
A No, I don't.
Q Was your husband ever married to anybody by the name of Lenore?
A No. And it says spouse next to it too.
Q He has never been married to anyone but you?
A No, of course.
Q And your name is not Lenore?
A No, it's not.
Q So you have never seen Commission Document No. 3 before?
A No, I have not.

MR. BOGIN: Off the record.

(Whereupon discussion was held off the record.)

BY MR. BOGIN:

Q I'm just going to ask you some questions bringing out some of the information that we took out before your deposition.

A Okay.

Q You said before that you went to dinners.

A Uh-huh.

Q And various meetings.

A Uh-huh.

Q You first heard of Lyndon LaRouche and the U. S. Labor Party when you first met your husband?

A Uh-huh.

Q What kind of events did you go to and what activities did you take part in in terms of the U. S. Labor Party?

A Well, I didn't take terms as far as any activities except if they had dinner, that's all. But I went to one -- different times they have been discussing different things. Everytime they were trying to raise money for

LaRouche.

Q It would be a fund raiser?

A It was fund raiser everytime I went to it. Mostly the only things I went to are the dinners. About three dinners I went to different places, and after the dinner they started collecting dollars, 1,000, 2,000, 500, 700, it depends how many...

Q How would they raise this money?

A Well, whoever is sitting there I think. The way I think -- just ask the people how much they want to contribute.

Q And what would they do, take out their checkbooks or --

A They don't take any checkbook. I don't know how they paid it. I just heard that someone has the paper and they just write down next to it how much the person is going to donate. One time they wanted to raise almost $50,000 and people just -- and plus they raise it through selling magazines and books and different things like that. But that's the only thing I know.

Q So it would be a pledge in a sense? When they

said how much you would give, they wrote down how much they planned to give?

A Yeah, how much they planned to give and then how they paid it later, I don't know. By checks or -- I don't know. By cash -- I don't know how they paid it but nobody just pulled out money and give them. They just wrote down how much each person was going to give -- they were short somehow. We still need ten more thousand, everytime I go there they were always short of so many thousand, some how they make the rest up, I don't know.

Q You said they sold newspapers and magazines.

A They sold books, newspapers, usually they sell a little of everything.

Q Do you know any of the names of the newspapers or books? Does New Solidarity strike a bell?

A Yes. What is the other one -- Fusion Magazine. They sell those like a magazine that comes every week or every month, something like that, and plus LaRouche makes books and they buy his books.

Q Dope, Incorporated, does that sound familiar?

A It sounds -- I am not sure. But there is thousands

of books that he makes. Plus they sell albums, classical albums.

Q What kind?

A Classical music.

Q LaRouche doesn't sing, does he?

A No. Say for Beethoven.

Q So what do they do, they buy the records and do they go out on the street with them?

A Okay, when they make a party, you know, when everybody comes in for dinner, then they have the table full of different things.

Q At the party?

A At the parties. But in the street they sell the magazines and the books in the street.

Q Have you ever sold any of that stuff?

A No way.

Q Do you know if your husband has?

A Yes, he used to go out into the street and sell the magazine and books, but he stopped now because I won't let him.

Q Do you know what he did with the money?

A What did he do with the money? Well, he was supposed to turn it to the office because it's, I think, they sort of a printing-like instruments, they don't have the funds to print more. They want to print more volume and they don't have it. They are trying to raise money to increase the volume of the printed magazines and that's it.

Q I never heard of that before.

A Well, they had albums like classical music albums.

Q Would they sell it very expensive or normal price?

A Usually more expensive.

Q They sell it for the purpose --

A See, they short of so much money for the LaRouche. That's the way I heard. And they sell all these things so they could make up for it, and the people who goes over there, usually they used to buy records $10, outside for $3.

Q Have you ever met Lyndon LaRouche personally?

A I think I met him one time at a party. He was

drinking. My husband wanted to introduce me to him. He said I want to introduce him to you. He is a great man.

Q When was that, do you remember?

A About three years ago. Long time ago.

MR. BOGIN: Off the record.

(Whereupon, a discussion was held off the record.)

BY MR. BOGIN:

Q Is there anything that you'd like to say about anything?

A Well, Lenore Sanders, I want to -- well, there is a letter that came that has Lenore Sanders on it to the house that I was going to return back. I asked David do you know anything about Lenore Sanders, he started laughing.

Q Do you remember what the mail was, was it from the Labor Party?

A Yes, it was.

Q Maybe this will help explain it a little bit. Maybe they confused your name because somebody wrote here --

A But I didn't sign it. They shouldn't have signed

it either. This is illegal. They shouldn't have signed it Sanders.

Q Well, as you said this is not your signature.

A No. This is forgery right there. No, Lenore Sanders, I don't know how did they get this.

Q Well, I think that should be it.

(Whereupon, there was a discussion held off the record.)

Q You were discussing Commission Document Exhibit No. 3. You are concerned that --

A That this money here, a thousand dollars, like he made this contribution directly to LaRouche from his ownself. Like he's making a payment himself. I don't think the U. S. Labor Party is giving him any money. But he's probably just telling me this so I don't get upset because like that's a lot of money to give to somebody instead of giving the money towards home.

Q So what you're saying is before when you testified that you thought the United States Labor Party was giving him money to pay back the loan, that's what he told you?

A Right, but I don't think they giving him anything. He probably told me this so he don't get in trouble with me. I'm saying he wouldn't have had to write this. I think he contributed that much money and he just didn't want me to know, that that's a lot of money to give.

Q And we have already established that the only thing you know is what your husband has told you.

A Yes.

Q So they could be paying it back or he could be paying it back, but either way it's a contribution.

A Yes.

Q I think the record is pretty clear that the only information you have about it is what you heard from your husband, and he might or might not be telling you the truth.

A I know. The way I see it, I think he's lying to me because otherwise he wouldn't have write this, I contributed --

Q Well, he might have written that for purposes of matching contributions.

See, when you contribute to a presidential candidate and the Federal Government will match $250.

A Yes, but see what I'm saying, they didn't ask him for contributions, they asked him to get a loan for them. So this should be just a loan from Household Finance, it shouldn't be I contributed, that meaning he gave this from his own pocket.

Q It looks like he might have done that.

A Yes, but this wouldn't have been needed to say because they only asked for a loan to help them, so why would he say I contributed if they are giving him the money back.

Q Remember the letter yesterday if you contributed?

A Legally, right.

Q Well, he could have signed that anyway without having done it, just the way some people might have signed that letter yesterday. You didn't, but other people might have signed the letter saying that they made a contribution when they didn't make a contribution. So, it's hard to know just by looking at that what the story is.

A Okay.

MR. BOGIN: Off the record.

(Whereupon, deposition was concluded.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Anthony Rolland, a Notary Public in and for the State of Maryland, County of Howard, do hereby certify that the within named, DIANA SAHYOUN, personally appeared before me at the time and place herein set out and after having been first duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulations contained herein were entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in

the outcome of this action.

As Witness, my hand and Notarial Seal, this 27th day of July, 1981, at Baltimore, Maryland.

NOTARY PUBLIC

LAWYER'S NOTES

Page	Line	

ATTACHMENT #1
page 3

January 22, 1980
(date)

I contributed $ 1,029.58 to Citizens for Larouche on

January 22 1980
(date)

David Sanders
(signature)

613 St. Ann's Ave.
(address)

Baltimore, Md.
(City) (state)

Lenore Sanders (spouse)

David Sanders.
613 St. Ann's Ave.
Baltimore Md.

C.E.M.
A.F.
7/8/80

ATTACHMENT # 1

Page 1

Date 1/23/80 Code 1-3 5-02

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

CK NO.	DATE	ACCOUNT	AMOUNT
	01/22/80		$*1,009.58 ← PAY

BALTIMORE, MARYLAND NO. 4
NOT VALID FOR MORE THAN $10,000.00

DAVID SANDERS

L. A. Wall

C.E.-1
A-41

ATTACHMENT #1
page 2

Pay to the order of Citizens for LaRouche

[signature]

CITIZENS FOR LaROUCHE
CITIBANK

Date 1/23/80 Code 1-3

32 1 0 1 7 2 1 3 7

d. 6/80
E. 7/80
C. 7/80

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF :

MUR 1158 :

- - - - - -

Pursuant to notice, the deposition of CHARLES CLARK, was taken on Friday, August 15th, 1980, commencing at 12:30 o'clock p.m., at the United States Attorneys Office for the District of Maryland, 8th Floor, Federal Court House, Baltimore, Maryland, 21202, before Phyllis Goldstein, a Notary Public.

- - - - - -

APPEARANCES:

Robert I. Bogin, Esquire,
On behalf of the Federal Election Commission

Marsha Gentner, Esquire,
On behalf of the Federal Election Commission

Peter Parker, Esquire,
On behalf of Witness, Charles Clark

Reported by:

Phyllis Goldstein

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

I N D E X

WITNESS:	PAGE
Charles Clark	3

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

CHARLES CLARK,

a witness, called for examination by the Federal Election Commission, after having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MR. BOGIN:

THE WITNESS: I do not want to perjure myself.

MR. BOGIN: For purposes of this deposition, the Federal Election Commission is of the opinion that Mr. Clark understands that he is to tell the truth in his testimony and that by not telling the truth, he is subject to perjury.

MR. PARKER: Mr. Clark, if you don't understand a question, make sure-- they will repeat it or clarify it. Don't guess at the answer.

Q Give us your full name for the record, please.

A Charles Clark.

Q And your address?

A 16 North Hilton Street.

Q Is that in Baltimore?

A Baltimore, Maryland.

Q And what is your occupation.

A I do stock clerk and porter work for a -- U. S. Electric Company, Emerson Electric.

Q How long have you been working at that job?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I came on up on '69. I were working August the 8th of '69, '70.

Q Right through?

A Yes.

Q So you have been working there for over ten years?

A Yes.

Q Have you ever heard of an individual by the name of Lyndon LaRouche?

A Yes, I have.

Q Could you tell us when you first heard of him?

A I heard of him about in the '70s. It was on a campaign. I started -- I met one of the boys downtown handing out leaflets to show that, you know, that an election was going on, so I have a donation and bought some papers.

Q You gave a donation and bought some papers.

A Yes, I was giving something for ten cents, you know, I bought one on the way home.

Q A dime?

A Yes.

Q You paid a dime and bought some papers?

A Yes.

Q Did the person who you bought the paper from introduce himself or herself?

A Yes, he did.

Q Do you remember who it was?

A Art Murphy.

Q Art Murphy. Did he take your name and address?

PRINTED BY BAYONNE, N.J. 07002 · FORM 740

A Yes, he did.

Q And did he ever contact you again?

A Yes, he did. He told me to come around, and I was asked for a donation, and introduced to Lyndon -- the President, he called him -- LaRouche then. He was seeking contributions and it was on different corners.

Q Did you give a contribution?

A Yes, I gave ten cents.

Q You gave ten cents. Did you ever give $70?

A Not right off, I didn't.

Q But eventually you gave $70?

A Yes.

Q Did you give $100?

A No.

Q How much did you give?

A $70.

Q In cash?

A No. Not in one sum. I gave -- he asked me to come in and show a few papers for him, and I went to a few classes with him. I went, and I gave small contributions up until now.

Q How small?

A I gave $5 most of the time when I would go in, and they gave me a few leaflets, too.

Q Where would you go? Where was this?

PENNAD CO. - BAYONNE, N.J. 07002 - FORM 740

A They had opened up down here on Calvert Street.

Q At the Medical Arts Building?

A No. Let me see. I don't know, but it was a -- I don't know exactly where, but it was right across from the fire house down there on Calvert. They were campaigning then for Lyndon LaRouche, so I told them if they wanted somebody to help out, I couldn't come in every day because I was working.

I went in, and I went in different times. They said whenever they had, um, what do you call it? A tape of Mr. LaRouche, they would show it and show that he was seeking election for President.

Q When you gave money, $5 or whatever, who did you give it to?

A They had a treasury then, a little treasury they would call it. The last one was by Steve. He would take all the contributions. If they have received any contributions, he would take these contributions, and we would sell some papers what they had and some of --

Q Mr. Clark, I am a little confused. Is it correct that you gave $5 sometimes to Citizens for LaRouche to the Committee?

A Well, they didn't have any committee then, not that I know of.

Q Did you give individuals $5 for Lyndon LaRouche?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A No, I didn't.

Q I misunderstood what the $5 was for.

A They would, well, the leaflets they would have, they would like, say, if they sold a certain amount of papers with this, Mr. LaRouche's campaign, half of the time they would give out a few amounts of papers and ask for a contribution through the papers, and --

Q Did you sell the papers?

A I sold probably one or two.

Q For a dime or for $5 or --

A For a dime, or some, most of the time, we would give them away. Just, you know, that we are looking for contributions.

Q Did you ever make a contribution for more than $50 at one time?

A No, I didn't. I had bought, the most I have done was bought a ticket to Mr. LaRouche when he appeared in Baltimore.

Q And how much was the ticket?

A Oh, $5 up to $25.

Q Do you remember how much you paid for it?

A (The witness moves head up and down, indicating positive response.)

Well, they have different tickets.

Q But how much did you pay for it?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I paid up to $25.

Q Well, did you pay $25?

A Yes, I did.

Q How many times did you do that?

A Oh, about three times. Not exactly $25, I will say $20 and 25 and 15.

Q Twenty-five, 20 and 15. That is $60. Did you pay it in cash?

A No, I didn't.

Q How did you pay it?

A They would introduce me to the ticket, and I would give, say, if I didn't have any contributions, I would give --

Q They would give you a ticket?

A They would give me a ticket. I would pay sometimes five or $10, whatever I had, a little contribution.

Q When you purchased your ticket, did you give the person cash for the ticket?

A Once or twice I did. I went to give -- when the tickets were -- I bought a $15 ticket -- I gave once.

Q And you paid $15 in cash?

A Yes.

Q Did you ever contribute -- Do you have a checking account?

A No, I don't.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Did you ever contribute to Lyndon LaRouche by purchasing a money order?

A No, I didn't.

Q Let me show you a document here. It is an American Express Money Order, and it is for $70, and it has your name, Charles Clark, on it. I was wondering whether you have ever seen that money order before today.

A No, sir, I haven't.

Q Is that your handwriting on that money order?

A No.

Q Is that your signature on the money order?

A No.

Q Did you ever make a $70 contribution to Citizens for LaRouche?

A I did, but I didn't pay it at one time.

Q You paid $5 here, $10, $20 there, in cash?

A Yes.

Q Do you remember who you gave the cash to?

A Yes, I do. I gave Debbie $5, she was treasurer, her and Larry -- her husband.

Q Freeman?

A Freeman. They were taking contributions.

Q Was there anybody else besides Larry and Debbie?

A The only ones I know was -- Steve.

Q Steve Warm?

Q Did you ever contribute to Lyndon LaRouche by purchasing a money order?

A No, I didn't.

Q Let me show you a document here. It is an American Express Money Order, and it is for $70, and it has your name, Charles Clark, on it. I was wondering whether you have ever seen that money order before today.

A No, sir, I haven't.

Q Is that your handwriting on that money order?

A No.

Q Is that your signature on the money order?

A No.

Q Did you ever make a $70 contribution to Citizens for LaRouche?

A I did, but I didn't pay it at one time.

Q You paid $5 here, $10, $20 there, in cash?

A Yes.

Q Do you remember who you gave the cash to?

A Yes, I do. I gave Debbie $5, she was treasurer, her and Larry -- her husband.

Q Freeman?

A Freeman. They were taking contributions.

Q Was there anybody else besides Larry and Debbie?

A The only ones I know was -- Steve.

Q Steve Warm?

PLNAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes. Of course, he is manager now. I think he was. I don't know. I don't know if he is with the Labor Party any more.

MR. PARKER: I think what he said was you don't know if he is still with them. Is that what you are saying?

Q With the Labor Party.

A (The witness moves head up and down, indicating positive response.)

Q Do you know that Lyndon LaRouche is running for President?

A Yes, sir, I did.

Q Do you know what party he is running with?

A But I didn't know, I still don't know what party. The only times I saw him downtown. I bought a ticket, and the other times I saw him on T.V. That is about it.

Q But you don't know what party he is running for for President?

A No.

MR. BOGIN: I would like to take this time to mark this American Express Money Order as Exhibit No. 1 and enter it into the record.

(Whereupon, the above mentioned article was marked as Commission Exhibit No. 1 for identification.)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Mr. Clark, do you recall approximately what times -- what day of the month, what month you bought tickets?

A No, I don't remember.

Q Was it in 1980?

A No. Let me see. It wasn't in 1980.

Q 1979?

A Let's see. I think the last time I have seen him was in '79. The last ticket I bought was about $25 then, because I only had two or three tickets I bought.

Q When you bought the ticket for $25, was that in January of '79 or June of '79? Do you recall any time frame?

A No, I don't think so.

Q Did you ever sign a document saying that you made a contribution for $70 to Citizens for LaRouche?

A Yes, I did. One by Steve, or, um, he had told me I had given a contribution of $70.

Q And he had you sign a form?

A Yes.

Q But you testified that you didn't make a $70 contribution.

A Well, not at one time. That is, not at one time in cash I didn't.

Q But it accumulated to $70?

A To $70.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Then, Mr. Warm came to you and asked you to sign a slip saying that you made a contribution of $70?

A Yes.

Q Do you remember when that was?

A It hasn't been too long ago.

MR. PARKER: This year?

A This year. Was it '79? No.

MR. PARKER: Well, this is 1980, this year.

Q Does your attorney happen to have a document, the one saying that he made a contribution for $70 signed?

MR. PARKER: Yes.

MR. BOGIN: Maybe we can show it to the witness and see if he remembers signing that. Can we make that an exhibit? We will make copies.

MR. PARKER: You already have this as an exhibit to the Freeman deposition.

MR. BOGIN: We don't have it for this one, though.

BY MR. BOGIN:

Q Do you recognize that document that your attorney, Mr. Parker, has given you that is dated February 21st saying that "I contributed $70 to Citizens for LaRouche on or about November 10th" signed by Charles Clark.

A Yes, I remember.

Q Is that your signature?

A Yes, it is.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Did you fill out any of that other information on that card?

A No, I didn't.

Q Do you know who did?

A No, sir, I don't. The only one who had access to it was Steve Warm.

Q He handed it to you?

A Yes.

Q How do you know that you contributed $70?

A Well, the only time that I -- they said during LaRouche's campaign, that I had given $70, because, like contributions of sometimes two, sometimes $5, $10, but it wasn't frequently, you know.

Q Do you want to say what you just said over again? Speak to the Court Reporter.

A I gave $5, sometimes two, sometimes $5, $10, recently to the campaign, and he told me it had accumulated to $70.

Q He told you that it had accumulated to $70?

A Yes.

Q So then you signed this form?

A Yes.

MS. GENTNER: Steve Warm.

Q Steve Warm told you that?

A Yes.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Do you remember whether or not these numbers, the date here and the amount and the date on this document that your attorney gave us was filled in when you signed it?

A I can remember the date. I think he had signed it his self.

Q These numbers were filled in already?

A Yes, all that was filled out.

Q Your name, and then somebody else put the address or is that your handwriting on the address?

A That is mine. No. Let me see. I wrote...

Q Your name?

A I wrote my name.

Q But not your address.

A And address.

Q That is your handwriting, your address?

A I don't know if I wrote my name. I didn't print. I don't print.

MR. PARKER: You signed your name and you printed the address and the city and state, right?

A I wrote it.

Q Yes, you wrote this? The address?

A That is my name. I wrote my name.

Q You wrote your name. Okay, we understand.

MR. PARKER: Just to clarify, is that your writing

Q Do you remember whether or not these numbers, the date here and the amount and the date on this document that your attorney gave us was filled in when you signed it?

A I can remember the date. I think he had signed it his self.

Q These numbers were filled in already?

A Yes, all that was filled out.

Q Your name, and then somebody else put the address or is that your handwriting on the address?

A That is mine. No. Let me see. I wrote...

Q Your name?

A I wrote my name.

Q But not your address.

A And address.

Q That is your handwriting, your address?

A I don't know if I wrote my name. I didn't print. I don't print.

MR. PARKER: You signed your name and you printed the address and the city and state, right?

A I wrote it.

Q Yes, you wrote this? The address?

A That is my name. I wrote my name.

Q You wrote your name. Okay, we understand.

MR. PARKER: Just to clarify, is that your writing

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

where it says address and city and state, or somebody else's?

A Somebody else.

MR. PARKER: Thank you.

MR. BOGIN: I would like to put this in the record now as Exhibit No. 2. It is the contribution verification signed by Charles Clark, dated 2-21-80.

(Whereupon, the above-mentioned article was marked as Commission Exhibit No. 2, contribution verification form signed by Charles Clark for identification.)

Q Mr. Clark, before, you told me that sometimes you would give money to Debbie Freeman, and you said that she was treasurer?

A Yes.

Q Did she tell you she was treasurer?

A No, what they -- there wasn't any treasurer. One would know the papers -- her and Larry actually -- I was introduced, and after I met those other ones on the corner who asked for a donation, and I was introduced to them, and I wasn't too good on selling the papers any way, so I would give a contribution to them.

Q Was that for the U. S. Labor Party that you gave the contributions for?

A Yes, sir, it was.

Q Not for Citizens for LaRouche?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Well, since then, these Citizens for LaRouche -- I haven't -- They said the check, they would send back for this, that it was for Citizens for LaRouche.

Q But when you gave the money, was it for the Labor Party, U. S. Labor Party?

A Yes, I would give through them. Anything I was introduced by them, and the material taken out or anything like that, they would know first.

Q Could you repeat your last answer?

A I said, through Debbie and Larry Freeman, they introduced us to these papers they were selling to raise a contribution for tickets.

MR. PARKER: For Citizens for LaRouche?

A And that is all, the only thing I was introduced to.

I gave a contribution to Citizens for LaRouche. They have printed out in the paper for this, giving the address, and Mr. LaRouche was campaigning then.

Q For the U. S. Labor Party?

A Yes.

Q So, you thought you were contributing to Lyndon LaRouche for the U. S. Labor Party?

A Yes, as far as I knew.

Q As far as you knew?

A Yes, sir.

PENAD CO., BAYONNE, N.J. 07002 - FORM 740

Q New Solidarity, is that the paper?

A New Solidarity.

Q And that is the U. S. Labor Party paper?

A Yes.

Q Let me see if I got what you said correct. Tell me if I am wrong. You met Mr. and Mrs. Freeman, Debbie Freeman and Larry Freeman, and they said to you, since you were not very good at selling papers, that you should give a contribution instead?

A Well, they were showing, they had classes, a few classes down there.

Q On how to sell the papers?

A No.

Q What were the classes?

A Different, they had films, they had tapes of Mr. LaRouche campaigning, and they were just starting it here in Baltimore and --

Q You would watch these tapes?

A Yes, I have watched these tapes, different places he has been, but I haven't actually seen -- I seen him two or three times in Baltimore, him and Mrs. LaRouche.

Q Did you give money at that time when you saw him?

A No, sir, I didn't.

(Whereupon, a brief off-the-record discussion was held.)

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Before you said you went to the offices, and it was on Calvert near a fire station.

A Calvert, right across the street, opposite of a fire station.

Q On Calvert Street?

A Calvert and --

MR. PARKER: Not Read Street?

A I think we passed Read Street.

MR. PARKER: Do you know where the Medical Arts Building is? Cathedral and Read?

A Downtown?

MR. PARKER: Where is this fire station you are talking about? That is on Calvert Street?

A That is on Calvert Street.

MR. PARKER: If you are going north, the fire station is on the right-hand side?

A On your right-hand side going north.

MS. GENTNER: You don't remember Calvert and what other street would be near there?

A No, I don't.

MR. PARKER: Like Madison or something?

A Let me see. The only thing I knew was Calvert.

Q So, were you ever inside an office?

A They had a small office, just enough to have classes on Mr. LaRouche's campaign, and I saw Mrs. LaRouche.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Is that where you usually gave your money? Did you give money to Debbie Freeman in that office?

A Yes.

Q To Steve Warm?

A Well, I would give, let's see. I gave when they first started, I would give, I gave a $5 contribution.

Q To Steve Warm?

A To Debbie first and then him when she wasn't there or Larry Freeman. They would take small contributions, because I will say Steve Warm, he would be there if they weren't, and he would take a small contribution.

Q Who told you to get Mr. Parker to be your attorney?

A Um, well, I was told this by Debbie and Larry.

Q Debbie Freeman called you up?

A No. I wasn't called, but last time I saw her, she said it wouldn't be necessary to come down.

Q But you came any way?

A But I came in. Nancy called me and told me. Not Nancy. Yes, Nancy told me to come in and, you know, that there would be -- told me last night.

Q Is that Nancy Radcliffe?

A Yes. She picked me up today and...

Q Did they tell you to say anything to us in this deposition?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Um, nothing. Just to tell --

Q To tell the truth?

A Yes, all I know.

Q To tell the truth?

A (The witness moves head up and down, indicating positive response.)

Q To tell what you knew.

MR. BOGIN: I have no further questions.

MR. PARKER: I have nothing.

MR. BOGIN: I would just like to advise you, Mr. Clark, that this matter is confidential, and that you should not speak about it with anybody other than your attorney, and that there happens to be criminal penalties associated with that provision. So, you should be careful in who you talk about this matter with.

MS. GENTNER: Do you understand that fully? Do you understand completely what that means?

THE WITNESS: Yes.

MR. BOGIN: You understand that it is a violation of law for you to talk about this matter with anybody other than your attorney?

MS. GENTNER: Other than Mr. Parker.

THE WITNESS: Yes.

MR. BOGIN: And us. Thank you very much for coming down. We appreciate your taking the time off

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

from work.

I have another tough question to ask you. Would you, it is called waiving your signature. Do you want to read this deposition before we get it?

MS. GENTNER: You can read it, and then sign it and when you read it, you can correct -- She is going to write it up, type it up, and you can correct what you think she may have typed wrong. If you see something, and she puts that you nodded your head yes, and you think you nodded your head no, for instance, or typographical errors, that kind of thing. Or, you can just let her transcribe it and not sign it, in which case it will come directly to us.

MR. BOGIN: You can talk to your attorney about it.

MR. PARKER: It is up to you whether you want to read it and sign it, or you can waive the reading. Would you like to read it or not?

THE WITNESS: Well, there is nothing -- as far as that goes, nothing has been said.

MR. PARKER: I would recommend that you waive the signing.

THE WITNESS: Yes.

MR. PARKER: Is that all right?

THE WITNESS: Yes.

MR. BOGIN: The witness has decided to waive

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

signature on this matter. Once again, we thank you for coming down.

(Whereupon, the witness was excused and the deposition was concluded at 1:07 p.m.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, County of Baltimore, do hereby certify that the within is a true and accurate recording of the proceedings indicated.

NOTARY PUBLIC

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN THE MATTER OF *
MUR-1158
THE FEDERAL ELECTION COMMISSION *

* * * * * * * * * * * *

Scheduled deposition of CHARLES CLARK, to be taken on Wednesday, July 23, 1980, to be commenced at 2:30 o'clock p.m., at the offices of the United States Attorney, United States Courthouse, Baltimore, Maryland, before Lawrence F. St. Yves, a Notary Public.

APPEARANCES:

Hal Ponder, Esquire
Robert Bogin, Esquire
On behalf of Federal Election Commission

Reported by:

Lawrence F. St. Yves

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837-3027

MR. BOGIN: Charles Clark, a witness to MUR-1158, at 2:30 p.m. on July 23, 1980 at Room 820, U.S. Courthouse, 101 West Lombard Street, Baltimore, Maryland has failed to appear.

It is now almost 4 p.m. on July 23rd. Charles Clark was sent a certified letter including a subpoena to appear on July 23rd. He has apparently signed the return request noting that he received the subpoena.

His failure to appear is subject to enforcement in the District Court.

* * * * * * * * * * * * *

GORE BROTHERS REPORTING COMPANY
221 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

9 3 0 4 0 3 7 2 3 6 2

80 AUG 21 A8:49

Federal Election Commission
1325 K St., N.W.
Washington, D. C. 20036
Attn: Mr. Robert Bogin

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF: :

MUR 1158 :

- - - - - -

Pursuant to notice, the deposition of DAVID SANDERS, was taken on Friday, August 15th, 1980, commencing at 11:10 o'clock a.m., at the United States Attorneys Office for the District of Maryland, 8th Floor, Federal Court House, Baltimore, Maryland, 21202, before Phyllis Goldstein, a Notary Public.

- - - - - -

APPEARANCES:

Robert I. Bogin, Esquire,
On behalf of the Federal Election Commission

Marsha Gentner, Esquire,
On behalf of the Federal Election Commission

Peter Parker, Esquire,
On behalf of Witness, David Sanders

Reported by:

Phyllis Goldstein

PENGAD CO., BAYONNE N.J. 07002 - FORM 740

I N D E X

WITNESS:	PAGE
David Sanders	3

PINGAIL CO., BAYONNE, N.J. 07002 FORM 740

DAVID SANDERS,

a witness, called for examination by the Federal Election Commission, after having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MR. BOGIN:

Q State your full name for the record, please?

A David Eugene Sanders.

Q What is your address?

A 613 St. Anns Avenue.

Q How long have you been at that address?

A About three years.

Q Is that in Baltimore?

A Yes, it is.

Q And what is your occupation?

A I work as a Lab Assistant for the State.

Q And what is your place of employment?

A State -- well, the Department of Health and Mental Hygiene.

Q In the City of Baltimore?

A Yes.

Q And how long have you been occupied at this present position?

A Four years.

Q Are you married?

PENNAS CO. BAYONNE, N.J. 07002 - FORM 740

A Yes, I am.

Q And your wife's name?

A My wife's name is Diana.

Q D-i-a-n-a?

A Uh-huh.

Q Is her last name the same as yours?

A Yes, it is.

Q Have you ever heard of Diana Sahyoun?

A Yes. That is my wife.

Q So it is Diana Sahyoun Sanders?

A Yes, it is.

Q Have you ever heard of an individual named Lyndon LaRouche?

A Yes, sir.

Q When was the first time you heard of him?

A About five years ago.

Q Did you ever meet him?

A I have, yes.

Q You have? When was the first time you met him?

A About five years ago.

Q Five years ago? What was the occasion? Was it a fund raiser?

A A fund raiser, yes.

Q And, do you know what Mr. LaRouche is doing in 1980?

PENROAD CO. BAYONNE, N.J. 07002 - FORM 740

A He is running for President.

Q Do you work for him? Are you a volunteer working for him?

A No, I am not.

Q Do you make contributions to him?

A Yes, I have.

Q But you have not done any work soliciting other people to make contributions or handing out literature.

A Mainly at fund raisers. I have just gone to fund raisers.

Q You have gone to fund raisers and assisted campaign workers there?

A Listen to speeches and -- just enjoying the usual political campaign.

Q And how many contributions would you say you have made to Mr. LaRouche for his campaign in 1980?

A I really don't remember a number. I can't remember the exact number.

Q More than three?

A Yes, I would say that.

Q Do you remember the amounts, how much you have contributed?

A Not in particular. Various amounts at various times.

Q Various amounts at various times. Have you been

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

married before?

A No, I haven't.

Q Do you know a Lenore Sanders?

A No.

MR. PARKER: What did you say, Dave? Yes?

MR. BOGIN: No. He said no.

Q When you make contributions, who do you give them to?

A Mostly anybody who was collecting at that particular time.

Q Did you ever give a contribution to Debra Freeman?

A Yes, I have.

Q Did you ever make a cash contribution to the campaign?

A Cash and check.

Q Cash and check?

A (Witness moved head up and down indicating positive response.)

Q Did you ever make a -- how much was the cash contribution you made, do you recall?

MR. PARKER: If you remember.

A I really don't remember exactly how much in cash.

Q But occasionally you made cash contributions?

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q To the campaign?

A Yes.

Q Do you ever remember giving cash to Debra Freeman as a contribution?

A I can't remember that.

Q Do you remember anybody who you gave cash to?

A No one in particular, no.

Q Who were various people who have received your contributions?

A Debbie, Larry.

Q Larry Freeman?

A Right. John.

Q John who?

A John Asher.

Q John Asher?

A Right. Nancy.

Q Nancy Radcliffe?

A Right. Shelly.

Q Shelly?

A Asher.

Q Asher?

A Right. Ogdon.

Q Ogdon?

A I can't remember his first name.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q His last name is Ogdon?

A Uh-huh. Many people.

Q So you have made at least six contributions?

A Well, I guess, you know.

Q But you remember that these were individuals that you gave --

A Right.

Q -- money to?

A Exactly.

Q What were the occasions that where you would give money? Were they mostly fund raisers?

A Fund raisers, yes. Right.

Q Did anybody ever solicit you for contributions?

A What do you mean by solicit?

Q Come say, "hey, give me a contribution for Lyndon LaRouche".

A When I heard LaRouche, right? I decided I think this man needs money for his campaign because he wasn't getting any money, and I voluntarily gave money.

Q Do you remember who asked you for it, though? I mean, somebody must have said, "hey, you know, give it to me".

You mean you gave your contributions to individuals, but were you solicited in giving them? Did somebody approach you?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A In the context of a meeting like that, right? It's usually called for from the chairman of the meeting or someone like that, right? And --

Q Who was the chairman at the meeting?

A At various times, Larry, Larry Freeman. A number of people.

Q Would you say Larry Freeman ran the campaign from Baltimore for the Baltimore area?

A I don't know if he ran the campaign or not.

Q But he had high visibility? He seemed to chair the meetings in general?

A Uh-huh.

Q Who else chaired these meetings?

A I guess, Debbie.

Q Debbie Freeman?

A Yes.

Q And then when they called for a contribution, you would take out your checkbook and write out a check?

A If I had -- see, I don't have a checking account.

Q Oh, you don't have a checking account.

A No.

Q Because before you testified that you gave cash and checks.

A Right.

PENSAR CO., BAYONNE, N.J. 07002 - FORM 740

Q What kind of checks did you give?

A These were checks maybe from, you know, like bankers checks.

Q Cashiers checks?

A Right, cashiers checks.

Q Did you ever contribute a money order?

A Money order -- probably.

Q Did you go to the fund raiser with a money order?

A Oh, no -- I mean, if the contribution was called for, right?

Q Yes.

A Sometimes it was called for in terms of, what do you call it? You say, "okay, I am going to give this..." and you give the money later, right?

MS. GENTNER: A pledge?

MR. BOGIN: Oh, a pledge.

A Right, a pledge.

Q So, then what did you do, send money to somebody? When you pledged it, did you later send a contribution?

A Yes, made out to CFL.

Q In Baltimore?

A Right.

Q Who did you give it to?

A Either I mailed it to the office, right, for CFL, or I might have given it to Debbie or either one of the people I mentioned.

Q What was the address for Citizens for LaRouche office?

A It wasn't exactly -- let's see. Medical Arts Building.

Q In Baltimore?

A Uh-huh.

Q So what would you do, Citizens for LaRouche or CFL, Medical Arts Building, Baltimore, Maryland?

A That was on the check, on the envelope, you know. It was addressed to -- yeah, Citizens for LaRouche.

Q Medical Arts Building, that was all the identification on the envelope?

A Right.

Q There was no floor, no room number, or you didn't have to put in a street address?

A Room number is 301.

Q 301. And how did you know that was the -- who told you that was where to send the check?

A Well, it's in the newspaper. It's -- various other places.

Q Which newspaper is that?

A This is New Solidarity.

Q New Solidarity.

A Uh-huh.

Q Do you get a subscription to New Solidarity?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes, I do.

Q How do you pay for it? Do you pay for it in cash?

A They have an address for a subscription, right, and you send money orders or whatever to New York.

Q Let me show you some copies of contributions that you made and ask you if you recognize them.

I have in front of me and now in front of you a Household Consumer Finance Division check for $1,009.58, payable to David Sanders. Do you recognize that check?

A Yes. I guess. Right.

Q How did you get a check from Household Finance?

A I applied for a loan.

Q And when you applied for a loan, did you fill out a financial statement?

A Uh-huh.

Q And you applied for a loan for what purpose?

A For this particular loan, it was for furniture.

Q Furniture?

A Exactly.

MR. BOGIN: I would like to mark Household Finance, Consumer Finance Division check, Commission Exhibit No. 1.

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

(Whereupon, the above-mentioned article was marked as Household Finance, Consumer Finance Division, Commission Exhibit No. 1 for identification.)

Q So, you told Household Finance that you wished to buy furniture?

A Yes.

Q Did you already buy the furniture?

A Yes.

Q So, was the furniture collateral for the loan? Could they have come in and taken the furniture away if you failed to pay the loan?

A That wasn't the collateral. The collateral was the house and car.

Q Oh, your house and car?

A Uh-huh.

Q Is this loan still outstanding?

A Yes, it is.

Q And you pay monthly payments?

A Yes.

Q You pay them personally?

A Yes. I do.

Q Does anybody give you money to pay the loan?

A No.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Did you contribute this check to the Citizens for LaRouche?

A Yes, I did.

Q How did you do that? You endorsed it payable to the Citizens for LaRouche on the back and signed your name?

A I can't remember that. I must have endorsed it, I guess.

Q Let me refresh your memory. I have the back of the cancelled check.

A Okay. That is it.

Q Is that your handwriting?

A Right.

Q That is your signature?

A Uh-huh.

MR. PARKER: Let me see it.

MR. BOGIN: I would like to mark the back of the check which says, "pay to the order of Citizens for LaRouche," signed by David C. Sanders, with a stamp that has Citizens for LaRouche city bank number on it, marked as Commission Exhibit No. 2.

(The above-mentioned article was marked as Commission Exhibit No. 2 for identification.)

Q Mr. Sanders, you said you got this loan for furniture.

A Uh-huh.

PIONEER CO. BAYONNE, N.J. 07002 FORM 740

Q But you actually used it to make a contribution to Citizens for LaRouche?

A Well, I got it for furniture, changed my mind and gave it for Citizens for LaRouche.

Q Do you remember when you -- this check from Household Finance is dated January 22nd.

A Un-huh.

Q 1930 -- 1980? Unfortunately, it looks like a typo, like 1930, but I believe it is 1980 -- that would have been a long time ago.

MR. PARKER: Even before I was born.

Q Do you remember when you made the contribution to Citizens for LaRouche?

A I remember that check, yes, sir.

Q Do you remember when you made the contribution?

A I can't remember when I made the contribution.

Q Was it the same day that you got this check?

A I really am not sure.

Q You have no recall? I mean, it must have been a big decision. This is a large check.

A It wasn't like a month afterwards, right? I don't think it was the same day; I mean, it might have been the next day, two days after, three days. I am not sure.

Q The funds for this loan were solely -- you said

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

your car and your house were the collateral for the loan?

A That is right.

Q Is the car in your name?

A Yes, it is.

Q Is the house in your name?

A No, it isn't.

Q Whose name is the house in?

A In my wife's name.

Q Diana Sahyoun Sanders?

A Un-huh.

Q How do you spell Sahyoun?

A S-a-h-y-o-u-n.

Q So that the proceeds of this loan represent money of yours and your wife's.

A Nothing of my wife's.

Q Nothing of your wife's?

A Huh-huh.

Q This is your money?

A Yes, so it must have been, I guess, just for the car.

Q Are you aware that an individual can only make a $1,000 contribution to a presidential candidate?

A No, I wasn't aware of that.

Q Who did you give this contribution to?

A I don't know.

Q Well, it's a big contribution. You must have remembered who you gave it to.

BAYONNE, N.J. 07002 · FORM 740

A I have given a number of contributions, and I really don't know.

Q When you gave this contribution, do you remember any conversation concerning that this is more money than the Committee can accept, that the Citizens for LaRouche can accept.

A No, not at that time.

Q When you gave this check to somebody, you don't remember any conversation concerning that? Didn't somebody say, "boy, that's a big contribution. Good work"?

A You mean the legalities?

Q No. Any conversation. Somebody must have been very happy to get such a large check.

A I was in a hurry to get back to work, and there wasn't much conversation. They said "thank you."

Q Do you remember signing any kind of documentation concerning this check saying that you made it?

A Right, I think so, yes.

Q Did you do it at the time you made the contribution?

A Uh-huh.

Q And what did that documentation say? I mean, what was on that documentation?

A It said something about contributions to Citizens for LaRouche.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Did it say something like, "I certify that I, David Sanders, gave a contribution of $1009.58 for Citizens for LaRouche" signed by you? To the best of your recollection, I want to know what it said.

A I don't know.

Q You signed the paper, right?

A I signed the paper, right. I can tell you the gist of the paper. It says that, like any other -- like a receipt, right? Any other document that when you give money, then in return, if you are to come forward later in regard to that money, then someone would know by your signature that you have given a certain amount of money for certain services -- in return for certain services, and in this particular case, it is services that are in the political line of things. When you think of -- you know, as a candidate, right? As someone who may give services to you as a citizen if they are elected to public office. So, in that regard -- it was a paper signifying that.

Q I am a little confused by services. The candidates are going to give you services?

A Of course. That is exactly what a political contribution is given for.

Q Tell me if this is a fair recitation of what you might have signed. "I, David Sanders, have made a contribution of $1,009.58 to Lyndon LaRouche for " --

PEGASUS CO BAYONNE, N.J. 07002 FORM 740

A His presidential campaign.

Q His presidential campaign, and then you signed it.

A Uh-huh.

MR. PARKER: Didn't your wife sign that document?

A You will have to ask her that, I guess.

MS. GENTNER: There seems to be a problem there in what the witness remembers and what his lawyer knows and remembers. You said you remember signing a document and you remembered what it said.

A Uh-huh.

MS. GENTNER: Do you remember seeing anybody else's name on the document?

A At that time?

MS. GENTNER: Yes.

A My name.

MS. GENTNER: Anyone else's name?

A No.

MS. GENTNER: No.

MR. PARKER: Just so the record is clear, I happen to have seen the document signed by both Mr. Sanders and his wife.

MR. BOGIN: For purposes of our investigation, could you use this piece of paper and sort of draw out the form. I don't expect you to know the words but --

MR. PARKER: I happen to have a copy of the paper

BAYONNE, N.J. 07002 · FORM 740

right here.

MR. BOGIN: Please, Mr. Parker, I am just curious --

MR. PARKER: As Mr. Sanders' attorney, we are not testing his memory. I have a copy of the document right here.

MR. BOGIN: Mr. Parker, please, this is important for our investigation. I wish you would --

MS. GENTNER: We are testing his independent ability to remember the facts, absent somebody who knows the facts from what you have been told to be the facts from somebody else.

A Is this for purposes of handwriting...

MR. PARKER: I am Mr. Sander's attorney.

MS. GENTNER: You are not permitted to instruct him how to answer. You are only permitted to instruct him if he can answer.

A I am not going to write anything if this is for purposes of handwriting.

MR. PARKER: I just want to show you this document in case it refreshes your memory.

MR. BOGIN: Let the record reflect that Mr. Parker was showing a document to the witness that the Federal Election Commission strenuously objects to.

Go off the record, please.

(Whereupon, a discussion was had off-the-record.)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: On the record. Mr. Bogin has suggested that a contribution in excess of $1,000 is a criminal violation.

MR. BOGIN: I have not suggested that it is a criminal violation.

MR. PARKER: You have suggested something to the effect that it was illegal to make a contribution in excess of $1,000. Now whether that means it is a criminal violation or not, I am not sure, because I don't know that much about the law, frankly. But, if it is a criminal violation, I am going to instruct the witness not to answer any further questions concerning any contribution in the amount of $1,009.58 on the grounds that it may incriminate him.

Further, the purpose, as I understand the Federal Election Commission is to conduct an investigation to get the facts. It is not to test people's memories.

Mr. Sanders is not a subject of this investigation. He is here only as a witness. If you want to get the facts, it seems to me you ought to take a peak at this document I have here which demonstrates that both Mr. Sanders and Mrs. Sanders signed a contribution form in connection with this $1,009.58.

MR. BOGIN: We appreciate your comments and on telling us how to run our investigation. However, for our

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

purposes, we would like to proceed.

MS. GENTNER: We are not trying to test, I mean, we are not trying to test Mr. Sanders' memory. All we are trying to do is get his independent assessment of how he remembers the facts. No one is questioning his memory on that.

MR. BOGIN: Or his veracity.

MS. GENTNER: Or his veracity.

MR. BOGIN: In addition, the Federal Election Commission has no jurisdiction over criminal matters.

They only have exclusive primary jurisdiction for civil matters under this Act.

MR. PARKER: Wait. Let's make sure that I understand the ground rules. Are you telling me that anything that is testified here will not be made available to any criminal investigatory or other body?

MR. BOGIN: We cannot make that representation.

MS. GENTNER: It may become criminal if it is determined that it is a known and willful violation. Then in that case, the Justice Department handles the matter and not the Federal Election Commission, I think, because they will probably have access to this deposition. I might point out that Mr. Sanders said he did not know it was a violation of the law.

MR. BOGIN: And we have already established that.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Mr. Sanders, you made a contribution. It is Federal Election Commission Exhibit No. 1, which is the Household Finance check, which is endorsed payable to Citizens for LaRouche signed by you.

A Uh-huh.

Q Now, you also have testified that you have signed another document concerning this contribution saying that you made this contribution.

A Right.

Q To the best of your recollection, could you describe that document to us?

MR. PARKER: If you are not testing his recollection, what possible point is there when the document is right here, and I have got it in my file, and I am willing to make it available to you. I don't understand this. Why would you want to be testing his recollection --

MS. GENTNER: He is a witness.

MR. PARKER: -- when he is not a subject.

MR. BOGIN: He is a witness to this investigation, and we would just like to understand what he remembers he signed.

Q You signed some document concerning this contribution; is that correct?

A Yes, I did.

Q What was the document that you signed?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: He has already explained to the best of his ability what it was. He told you.

Q When you signed that document, was there another signature line on that paper?

A Before I put my signature?

Q Before you put your signature on.

MR. PARKER: If you remember.

A I really don't remember.

Q Do you remember seeing your wife's name on the document?

A I don't know.

Q What is your wife's name?

MR. PARKER: He has already said what his wife's name is three times.

Q Do you remember a Lenore Sanders?

MR. PARKER: He said no.

A No.

MR. PARKER: You have got to stop asking the same question over and over again.

Q Let me show you Commission Exhibit No. 3, which is, "I contributed $1,009.58 to Citizens for LaRouche," dated January 22nd, 1980, and it is signed by David Sanders. Do you recognize this document?

A Yes, sir.

MR. BOGIN: I would like to mark this document

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

as Commission Exhibit No. 3.

(Whereupon, the above-mentioned article was marked as Commission Exhibit No. 3 for identification.)

MR. PARKER: I might point out that is the same document in my file.

Q Mr. Sanders, do you remember signing this document?

A Yes, I do.

Q When you signed this document, were there lines over here at the time you signed it? I mean, was this information written in?

A Was the information written?

Q Right. To the left of where you signed, was there anything written there at the time you signed?

A I don't know. I remember signing my name. I am not sure about this.

Q Could you read the name that is next to yours there?

A I can read this down here.

Q Well, no, the signature.

A No.

Q Is that your wife's signature?

A I am no expert. I don't know.

Q Have you ever seen your wife sign her name like that?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I don't know.

Q I mean, we read that to say Lenore Sanders. Do you see that to be anything other than that?

A It could be.

MR, PARKER: Who wrote that Lenore Sanders on there?

A I really don't know who wrote that.

Q But, can you tell me that whether or not this handwriting that is purportedly to be Lenore Sanders' was on tnis document when you signed it?

A No.

Q Were you told that your wife was going to sign any document that you were going to sign?

A I talked to my wife about it, and I don't know if she signed it or not.

Q Who was the person who gave you this document to sign?

A Debbie.

Q Debbie Freeman? And I see that the date on it is January 22nd. It is the same date that you got the loan. Do you recall that you did those things on the same day?

A Was it the same day? Okay. It must have been the same day.

Q Before you testified you didn't think it was the

same day.

A Right. I said I didn't think it was the same day. It might have been the day after. But since the dates here are the same, obviously it looks like it's the same day.

Q It is not obvious. Because the days are the same does not mean you did it the same day.

A Oh, yes, that is a point. Right. It could have been the next day and I put the wrong address, or something. I am not sure.

MS. GENTNER: By looking at that, you didn't all of a sudden remember it was the same day?

A No, I didn't.

MS. GENTNER: You are basically just looking at it and guessing still. You don't remember.

A Yes, I am not sure if it was the same day or not. If someone came up to me and said those two dates on there are the same, it could have been the day after or something. I am not sure. I am sure it was close to that same day. It wasn't like a month or two months afterwards.

Q At the time you gave this check, which is Commission Exhibit No. 1, do you recall any conversation concerning that check when you gave it to somebody? Do you recall who you gave it to?

A This particular check?

Q Yes.

A I can't.

Q At the time you gave this check to somebody, did

PENNSYLVANIA BAYONNE, N.J. 07002 - FORM 740

you have any discussion that you were going to have to sign something?

A Okay. With this?

Q This Exhibit No. 2 -- well, it is marked No. 3.

A Debbie is the one who actually talked about this particular thing that I signed.

Q Right. I appreciate that. But, you didn't sign the document at the same time that you gave a contribution, did you?

A No.

Q Do you recall who you gave the contribution to, the actual check?

A I really can't.

Q Do you remember any conversation associated with the time you gave this check?

A Just a general thing that -- you know -- what was happening, foreign affairs, what is happening in the country. What is happening with the campaign. But I can't remember who it was in particular.

Q You had a conversation, but you can't remember who it was?

A No, this was in January.

Q But you never saw this person before?

A I don't know.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q But you had discussion about foreign affairs?

A I am sure -- you know -- like with most of the people who are in the office or around the office, right?

Q Is this at the Medical Arts Building?

A Yes, at the Medical Arts Building. It could have been anybody that I was talking to at that particular time.

Q Do you work in the Medical Arts Building?

A No.

Q Do you come there after work or during lunch?

A Sometimes during lunch.

MR. PARKER: It is not far away, just for your information.

A Yes.

Q And then you will go there, and whoever is there, you will talk with and say, "hey, I would like to make a contribution"?

A Not every day.

Q Did anybody suggest to you that you should take a loan out from Household Finance and make a contribution with that?

A No.

Q It was completely voluntary on your part?

A Yes, it was.

Q Did your wife know you were taking out a loan to

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

contribute to the Committee?

A She always knows.

Q How did she know?

A I tell her.

Q Let me show you a document and ask you to identify it. This is a Federal Express Money Order with your name on it payable to Citizens for LaRouche. I ask you if you have ever seen it before. (tenders)

A I am not sure.

Q Did you purchase this money order?

A I don't know.

Q Is that your handwriting on the money order?

A No, it is not.

MR. BOGIN: I would like to mark this as Commission Exhibit No. 4, Federal Express Money Order No. 113833058.

(Whereupon, the above-mentioned article was marked as Commission Exhibit No. 4, Federal Express Money Order 113833058 for identification.)

Q Mr. Sanders, have you ever seen this money order before today?

A Probably not, since that is not my signature.

Q Do you ever remember making a cash contribution of

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

$45 to Citizens for LaRouche in that sum?

A Yes, I have made -- you know -- around $45, $50, sometimes.

Q I show you another -- and that signature on there is not your signature.

A No.

Q I show you another document signed by you saying that you made a -- you personally contributed $45 in the form of a money order payable to Citizens for LaRouche on November 28th. Do you recognize that document?

A Yes, I have seen one like that before.

Q Is that your signature on it?

A This looks the same as that.

Q But this is not your signature?

A No.

Q So you never signed that document?

A No.

MR. BOGIN: I would like to mark this as Commission Exhibit No. 5.

(Whereupon, the above-mentioned article was marked as Commission Exhibit No. 5 for identification.)

Q So, Mr. Sanders, Commission Exhibit No. 5 is not your signature?

A No.

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

Q I show you another American Express Money Order this time, another money order from American Express for $25. Have you ever seen that money order before?

A I can't say that, no.

Q Did you purchase that money order?

A No.

Q Is that your handwriting on the money order?

A No, that is not.

Q Did you ask somebody to buy you a money order?

A This particular money order?

Q Yes.

A I can't say. I have given money, right?

Q Cash.

A Cash, right.

Q But you never told anybody to purchase a money order for you?

A Well, I figure they can't send cash through the mail so --

MR. BOGIN: I would like to mark this as Federal Election Commission Exhibit No. 6.

(Whereupon, the above-mentioned article was marked as Federal Election Commission Exhibit No. 6 for identification.)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MS. GENTNER: Just to clarify, you have never instructed anybody to get -- to purchase a money order with your cash; is that correct?

A You mean with Citizens for LaRouche?

MS. GENTNER: Right.

A I thought it was obvious that if I were to give a contribution, the only way that the money would get to CFL is for someone to get a money order.

MS. GENTNER: But you never yourself said --

A I am not in a position to, you know, to give commands about what my position is to giving contributions, right?

MS. GENTNER: So, you just gave the money? You never said, "Please buy a money order with this"?

A No, I said this money is to go for Citizens for LaRouche, right?

BY MR. BOGIN:

Q How did you pay for your New Solidarity subscription?

A I work every day.

Q No, no. I don't mean it that way. Who did you give the money to? Did you send it directly to New York?

A Yes, the subscription, usually I will take six months at a time, sometimes a year, whatever the amount of money I have, and, you know, at various times I would send the subscription money to New York.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q How do you send money up to New Solidarity? You said you did not have a checking account.

A I usually would go to Equitable and get a money order.

Q Equitable Bank?

A Uh-huh.

Q Because it is close to work?

A Yes.

Q Just to clarify the record, I am showing you again Commission Exhibit No. 6, which is the money order for $25. That is not your signature on that money order or your handwriting on the money order?

A No.

Q When did you meet Ms. Freeman for the first time?

A I guess '77, I guess. I am not sure.

Q Larry Freeman?

A The same time.

Q Nancy Radcliffe?

A I guess around the same time.

Q Robert Primack?

A I am not sure.

Q Have you met him?

A Yes. I guess around '78.

Q Does he work for Citizens for LaRouche?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I am not sure if he works for them or not.

Q Did you ever see him at the Medical Arts Building, Room 301?

A Yes. No.

Q He has never been there?

A I am saying I don't see him any more.

Q But you have seen him? That is where you met him?

A I have seen him there previously, yes.

Q And you have seen Larry Freeman at that room?

A Yes.

Q And Debbie Freeman?

A Yes.

Q And Nancy Radcliffe?

A Right.

Q Do you recall any other people you met in this room? Their names?

A Just first names.

Q Mr. Asher?

A Okay, yes. John Asher and Shelly Asher, that is his wife, Shelly Asher.

Q Mr. Ogdon?

A Ogdon. Others -- I really can't recall all the names now.

Q Have you talked with any of those people that you

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

just mentioned about coming here today?

A Yes.

Q Did they get in touch with you? Did they know that you were going to give your deposition?

A I got in touch with them.

Q As soon as you got your notice from the Federal Election Commission?

A From the FEC.

Q Who did you call?

A I called the office and I don't know who answered.

Q Do you happen to know the telephone number for the office?

A Not any more. The phones are cut off.

Q The phones are cut off. Do you remember who you spoke to about the investigation?

A Debbie.

Q Debbie? Did you say, "hey, Debbie, I have got a notice here. I have to take a deposition"?

A I said, "yes, I got something here." At that time I didn't know what it concerned, right, but I figured it concerned something with Citizens for LaRouche, because if I had been with Carter or somebody, I probably wouldn't have been bothered at all.

Q I will have to disavow that statement. What was your discussion concerning your testimony? Did you go over

PIONEER CO. BAYONNE, N.J. 07002 - FORM 740

with her what you were to testify today?

A No. Not -- we just talked about what time we would meet here and everything, who the lawyer is, right; Peter Parker and stuff like that.

Q You never talked about the contributions you made and activities with Citizens for LaRouche concerning this deposition today?

A No, not in particular.

Q In general?

A In general, yes.

Q Did she instruct you to answer questions in a certain way?

A No.

Q Did she tell you not to tell the truth in any way?

A No.

Q You have told us the truth to the best of your knowledge today?

A Exactly.

Q Did you know Felice Gelman before today? Had you ever met her?

A No. I knew of her.

Q What about Charles Clark?

A Who?

Q Charles Clerk?

A Oh, Charles, yes.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q You have known him before today?

A Right.

Q How did you know him?

A Just through coming to different fund raisers and -- campaign speeches and so on.

Q Kevin Salisbury?

A Yes.

Q The same way?

A Right.

Q You don't consider Charles or Kevin to be volunteers for LaRouche?

A What do you mean, volunteering money?

Q No, not money. Their time.

A Their time? No.

Q Like you go a little bit, but you are not really a volunteer?

A As soon as you go to a campaign meeting, you are taking your time out to go there. So that is a volunteering of time, in that respect. But I think what you are trying to say is, did I sell papers and stop people's cars and hand them posters and stuff like that, you know. That type of thing I haven't done.

Q What papers would it be? New Solidarity?

A Probably.

Q Probably, but you don't know?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: He says he has never done it.

Q Right, but he does know they sell papers; I was wondering.

A If it is the right article, it could be the Sunpapers.

Q Are you familiar with Dope, Inc.?

A Dope, Inc.? Incorporated?

Q Yes.

A The book?

Q Yes.

A Not the organization?

Q Not the organization.

A No.

Q Did you purchase a book from Dope, Inc.?

A Yes, I think I did.

Q Who sold it to you?

A There you go again. I can't -- you know, there are so many papers and books and stuff, it is hard to say, you know, who sold this one because there are a lot of people who sell books and so on.

Q Was it anybody associated with Citizens for LaRouche?

A These are people associated with whatever that campaign --

Q Publications?

A Right.

Q At the Medical Arts Building?

A Yes.

Q Do they share offices with Citizens for LaRouche?

A Yes, I think so.

Q What makes you think so?

A Well, they are in the same location.

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

Q Do you know if Robert Primack works for New Campaigner Publications?

A I am not sure whether he works for them or what.

Q How did they answer the phone when you used to call CFL headquarters? Did they say, "New Campaigner Publications"?

A At CFL?

Q Uh-huh.

A No, Citizens for LaRouche.

Q They would answer "Citizens for LaRouche"?

A Right.

Q Have you ever seen your wife sign something before?

A Anything?

Q Yes, anything.

A Yes.

Q Are you familiar with her signature?

A Yes.

Q Just to clarify the record, does that signature in Commission Exhibit No. 3 next to your name look like your wife's signature?

MS. GENTNER: In your opinion.

A I really can't -- you know, it might be. I don't know.

Q But you have never seen it quite like that before?

A Not so fancy.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. BOGIN: We have no further questions.

MR. PARKER: Let me have that No. 3 for a second.

EXAMINATION BY MR. PARKER:

Q Mr. Sanders, below the signature on Exhibit No. 3 are written out David Sanders and over here Lenore Sanders. Do you know whose handwriting that is?

A No, I don't.

Q It is not yours, I take it?

A No, it is not.

Q You didn't write that. Do you remember if that was on there when you originally signed the thing?

A No. No, this wasn't.

Q That is what I am talking about, the written out names which are below down at the bottom of the signature and this address, 613 St. Anns Avenue. That wasn't there either at the time you signed it; is that right?

A No, it looks like somebody might have written that from the names up there.

Q Yes, and I take it you also told Mr. Bogin that you never instructed anybody to buy money orders to be sent to New York.

A Not -- you know, buy a money order and send it to New York, no.

Q Did you have any objection to anyone taking your cash and buying a money order or to transmit the

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

contribution to New York?

A No, that is why I gave the contribution for them to send the money up there.

MR. PARKER: That is all. I have.

EXAMINATION BY MR. BOGIN:

Q While we are at it; number three, is this your handwriting, where it says January 22, or the amounts?

A The amount is; this isn't.

Q The date isn't?

A Yes.

Q The amounts -- this dollar figure is?

A Right, I wrote that.

Q So, it says you contributed that amount of money to Citizens for LaRouche?

A Uh-huh.

Q At that time, you don't remember seeing the signature next to your name written there?

A I don't know.

Q So far as you are concerned, you made the contribution?

A Uh-huh.

MR. BOGIN: Okay. No further questions. I would like to point out that matters that we have discussed under the Federal Election Campaign Act are confidential, and there are actually criminal penalties involved if you should

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

talk about this matter with anybody but us and your attorney. I would like to apprise you of that fact. We appreciate your coming and taking time off from work to come down here.

THE WITNESS: All right.

(Whereupon, the witness was excused at 11:56.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, County of Baltimore, do hereby certify that the within is a true and accurate recording of the proceedings indicated.

NOTARY PUBLIC

PENNAL CO., BAYONNE, N.J. 07002 - FORM 740

909774

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN THE MATTER OF *

MUR-1158

THE FEDERAL ELECTION COMMISSION *

* * * * * * * * * * * *

Deposition of EARNEST K. PULSIFER was taken on Wednesday, July 23, 1980, commencing at 4:10 o'clock p.m., at the offices of the United States Attorney, United States Courthouse, Baltimore, Maryland, before Lawrence F. St. Yves, a Notary Public.

APPEARANCES:

Hal Ponder, Esquire
Robert Bogin, Esquire
On behalf of the Federal Election Commission

Russell G. DeVoe, Esquire
On behalf of Earnest K. Pulsifer

AUG 21 9:57

Reported by:

Lawrence F. St. Yves

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837-3027

I N D E X

Witness:	Page
EARNEST K. PULSIFER by Mr. Bogin	3

E X H I B I T S

Pulsifer Deposition Exhibit:		Page
No. 1	Money order sample	19
No. 2	Money order sample	21
No. 3	Money order sample	22
No. 4	Money order sample	24
No. 5	Money order sample	25
No. 6	American Express money order	27
No. 7	Money order sample	28

* * * * * * * * * * * * *

STIPULATION

It is stipulated and agreed by and between counsel for the respective parties that the reading and signing of this deposition by the witness be and the same are hereby waived.

* * * * * * * * * * * * *

EARNEST K. PULSIFER,

called for examination by the Federal Election Commission, being first duly sworn to tell the truth, the whole truth and nothing but the truth, testified as follows:

EXAMINATION BY MR. BOGIN:

Q. Please give us your name for the record.

A. Earnest Kinnear Pulsifer.

Q. Mr. Pulsifer, where are you living presently?

A. I'm living in Glen Burnie, Maryland at 209 Second Avenue, Southeast.

Q. How long have you resided at that residence?

A. Approximately two years.

Q. And what is your occupation?

A. I am mainly employed by the State of Maryland in the capacity as the Assistant to the Chief, Training Section, Bureau of Construction Inspection, Division of Construction, State Highway Administration, State of Maryland.

Q. And your place of business?

A. 300 West Preston Street, Baltimore, Maryland.

PICKARD & CO. BAYONNE, N.J. 07002 - FORM 740

Q. How long have you had this position?

A. Approximately two years.

Q. Are you married, by the way?

A. Yes, I am.

Q. Your wife's name?

A. Janet Rex Pulsifer.

Q. Have you ever heard of an individual named Lyndon LaRouche?

A. Yes.

Q. Who is Mr. LaRouche?

A. As far as I know he is a man who is involved with a party called the U.S. Labor Party and who according to the people that are involved with him, is running for the President of the United States.

Q. And how did you come to hear about him?

A. Through a sidewalk campaign held in the Glen Burnie area.

Q. And do you remember any of these individuals who you met there? You mentioned that you know some individuals who talked to you about Mr. LaRouche. Do you know their names?

A. The man I originally contacted or who I talked with at the campaign, no, I do not. My name, I had given him one of my cards and a Lawrence K. Freeman had returned or called me in regard to the information.

Q. Do you remember when this was approximately? Was it in 1978?

A. Oh, no, it would have been 1979, late,or early '80.

Q. So to the best of your recollection, November or December of '79 or early '80?

A. Yes.

Q. And did Mr. Freeman telephone you at a number that was printed on your card?

A. Yes.

Q. And what was that conversation?

A. They were going to have a video showing of Mr. LaRouche and he wanted me present to see it. Instead of that particular conversation or being present at that viewing and his wife Debra met me at the -- it's a little lounge in the Belvedere Hotel and we sat there and talked about who LaRouche was, the Jewish implications and the world policies of which they were very familiar with and which I am not familiar with.

I am very much a novice in all of this, but one of the things that they had brought out in that conversation was evidently being that both of these persons are both of Jewish descent and there was a lot of personal knowledge in regard to the differences between Judism and Zionism and they worded it.

Q. Did you arrange or any telephone call to meet at

the lounge and discuss?

A. Yes.

Q. Besides conversations were you asked to contribute to the campaign?

A. Yes, I was.

Q. Did you make a contribution to the campaign?

A. Not there at the lounge, but from there we went back to their campaign headquarters and I think the sum as I recall that I did contribute that evening was $100, plus I think I picked up the tab at the Belvedere.

Q. That $100 contribution, was that by personal check?

A. No, that was by cash. That was a $100 bill, as a matter of fact.

Q. And you gave it both the Freemans at the headquarters?

A. Okay, at the time of the actual cash transaction, as best I can recall only Larry was there.

Q. Okay, where is the headquarters?

A. It's in the Medical Arts Building, Room 301.

Q. In Baltimore, Maryland?

A. Yes.

Q. And can you recall to the best of your recollection what date that might be?

A. No.

Q. Before Christmas?

A. No, I would say after the new year.

Q. I have in front of me a card, Lyndon H. LaRouche, Democratic candidate invites you to a national cocktail party which you showed us before we took the deposition. Do you recognize this card?

A. Yes.

Q. When did you receive that card?

A. Okay, the December 9th date I --

Q. Excuse me, could you just answer the question?

A. Restate the question.

Q. Do you remember when you received that card?

A. I received it well before the date. I remember that much, because I received one of these cards on one date and one at a later date.

Q. How did you come about obtaining these cards?

A. They were given to me for contribution of $100.

Q. So then is it fair to suggest that when you gave your $100 contribution it was before December 9th, 1979?

A. Yes, in both cases. In other words, there was a contribution of $100 for one of the cards and then later there was a cash transaction or there was a cash transaction of I am pretty sure of the figure as $150.

Q. I will ask you about that. Just to repeat what you have already said, at some point you got a telephone call from the Freemans, is that correct?

A. That is correct.

Q. And you met them in a lounge?

A. That is correct.

Q. Some time that evening after meeting them in the lounge you went to LaRouche campaign headquarters in Baltimore?

A. Yes.

Q. And at that time you gave a hundred dollar cash contribution to Larry Freeman?

A. That is correct.

Q. Now have you made subsequent contributions to the LaRouche campaign?

A. After the original $100, yes.

Q. Okay, could you tell us how much that was for?

A. Okay, I made one contribution, I don't recall exactly when. I think the figure was $50 and then a third contribution -- no, $40 was that figure and then another contribution of $150.

Q. And were these both in cash?

A. All three of those were in cash.

Q. Who did you give the $40 contribution to?

A. In each case it was to Larry Freeman.

Q. The $150 one?

A. That is correct.

Q. And they were on separate days?

A. Yes.

Q. How did you come about to give these contributions? How were you solicited?

A. Could you give me a better definition of what you mean?

Q. The first time somebody called you up and said, let's meet and they asked you for a contribution, how did you get together for the second and third ones?

A. Same way, telephone calls and then me meeting with them. I still to this date have not seen any of the video tapes of LaRouche.

Q. I see that you have in your possession books, one called The Power of Reason and another How to Defeat Liberalism and William F. Buckley, paperback books that are new looking and some magazines called Executive Intelligence Review dated August 14 and one dated July 24, one dated November 27, all in 1979 and various other documents.

How did these get into your possession? How did you obtain these documents?

A. Okay, the majority of this type of printed matter came into my possession at the time of the $40 transaction.

Q. Now I see that some of these magazines are dated as early as July 24, 1979. Is it possible that the $40 contribution came as early as July 24, 1979?

A. I would say that these magazines came all into my

possession at the same time.

Now he asked me, whatever the figure was, I think it was a hundred dollar contribution again to subscribe to this magazine which I told him I really wasn't that interested in.

Whatever the last date on one of these is, which I imagine would be this one, would be the period of time the whole thing came into my possession because one of them was just off the press and I think that was it.

Q. You got these magazines, and when did you get these books?

A. Okay, this one came with the second group.

Q. How to Defeat Liberalism?

A. Yes, and this one came at the time that the first contribution was made.

Q. The Power of Reason?

A. Now there was another paperback book called Dope, that I looked for my copy of it and I didn't find it. I was going to bring that with me, too.

Q. When did you receive that?

A. At the time of the first contribution.

Q. Was your contribution for the purpose of purchasing these books?

A. That's an area I'm really not too certain on. I don't know whether the contribution was for reimbursement of

the literature or whether or not it was a direct contribution to the campaign in general.

Q. Let's then go back to your discussion with Mr. Freeman for the first $100 contribution. Could you tell us to the best of your recollection what the conversation was that created the desire for you to give a hundred dollars to Mr. Freeman on that date?

A. Well, I was interested in who he was.

Q. Mr. LaRouche or Mr. Freeman?

A. Mr. LaRouche, I knew that through studies of my own privately that there are things that will be happening in the near world future, that powers will be raised up that are here now, but are not generally known and I was wondering whether or not this might not be one of those people.

Q. When you gave your money, was it your intention to influence the election, Mr. LaRouche's election?

A. Not really. I didn't see where the monies that I gave would be that great to do anything really.

Q. Was the money to buy the books? Did you think by giving the $100 you were getting these books?

A. No, the literature was there, but I remember the term general funds.

Now how exactly it was used, what context I can't really designate it.

Q. These contributions were made in 1979. Did you

file an income tax return for 1979?

A. Not yet.

Q. When you do file your income tax for 1979, do you intend to deduct the amount of money as a contribution to Mr. LaRouche?

A. I don't know. I will tell you the reason I don't know is because I don't have accurate documentation, the fact that I gave the money.

Q. Because it was in cash?

A. Yes, because it was in cash so I for the price of what I have given I'm not interested in a whole lot of hassle.

Q. You told us that you made a total of three contributions totalling one for a hundred dollars, one for 40 and one for $150.

Do you remember any other contributions that you might have made or cash transactions that you might have had with Mr. Freeman or Lyndon LaRouche Committee?

A. No, I would say that that would be the total of it for the Lyndon LaRouche campaign.

Now there are other people that I have given cash or given financial assistance to for the specific purpose of seeing their reelection, but that didn't have anything to do with this.

Q. Do you have a checking account?

A. Yes, I do.

Q. Is there any particular reason why you didn't give a check?

A. Yes, because I had cash on me.

Q. Have you heard of the matching fund payment account?

A. Yes, I have.

Q. How did you hear about that?

A. Newspapers, television, just word of mouth.

Q. Did Mr. Freeman tell you that your money might be matched by the Federal Election Commission?

A. He mentioned that much later on in one of the conversations we had which when he at that time was looking for much larger funds. He was looking for contributions in the area of $500 to a thousand dollars and I was not interested in contributing that kind of cash.

Q. We are going to try and get back to the reason why you gave this money. It's still a little fuzzy.

Did you give this money to the U.S. Labor Party?

A. To the best of my knowledge I gave the money to a Democrat who was running or to the organization, the campaign organization that was behind a man that was running on the Democratic ticket and the U.S. Labor Party I almost have no knowledge of.

Q. So you basically gave the money because you believed in the philosophy of Lyndon LaRouche?

A. Mainly because I believe in the philosophy of the Democratic Party which I am a member.

Q. I'm going to ask you whether or not you know some other individuals besides the ones that we have mentioned already.

Do you know a Robert Primack?

A. There have been a number of people that I have met in association with the LaRouche campaign headquarters for the New York area, D.C. area and that sort of thing. Most of them were at this cocktail party.

That name that you just mentioned that I couldn't even repeat back to you, I'm not that familiar with it, but it does sound familiar.

Q. Do you remember anybody else from the LaRouche committee that contacted you?

A. Personally I don't think anybody else returned or made any telephone calls to me or mailed any literature to me outside of the Freemans or that organization.

Q. Have you ever heard of an individual by the name of Felice Gelman?

A. No, that name doesn't sound familiar.

MR. BOGIN: Off the record.

(Discussion off the record.)

BY MR. BOGIN:

Q. Have you been contacted by Mr. Freeman in the last

couple of weeks?

A. Yes.

Q. Could you tell us what the basis of th

sion was?

A. Okay, the telephone number that he has contacted me at was the home telephone number. I have not been at home to accept those calls. My wife has talked to him and she has been very vague as to what my instruction is. Let me explain something else in a little bit more detail to you.

The LaRouche campaign headquarters, I do not believe is familiar with the fact that my main source of income for a number of years has been my employment with the State of Maryland. The reason I say that, in fact which was one of my original reasons in kind of looking into this thing, I have been associated with a corporation that is called Amway and in this you do what you call prospecting and that simply is meeting a great number of people and I do meet a great number of people because of it.

I know that there are enough people in association with Amway where it could be meaningful to anybody that is running for public office. I have also been told through the membership with Amway that one of the founders of the corporation has been asked to run for President of the United States, but who has declined to run for President

couple of weeks?

A. Yes.

Q. Could you tell us what the basis of that discussion was?

A. Okay, the telephone number that he has contacted me at was the home telephone number. I have not been at home to accept those calls. My wife has talked to him and she has been very vague as to what my instruction is. Let me explain something else in a little bit more detail to you.

The LaRouche campaign headquarters, I do not believe is familiar with the fact that my main source of income for a number of years has been my employment with the State of Maryland. The reason I say that, in fact which was one of my original reasons in kind of looking into this thing, I have been associated with a corporation that is called Amway and in this you do what you call prospecting and that simply is meeting a great number of people and I do meet a great number of people because of it.

I know that there are enough people in association with Amway where it could be meaningful to anybody that is running for public office. I have also been told through the membership with Amway that one of the founders of the corporation has been asked to run for President of the United States, but who has declined to run for President

because the word that I have is that he can do more good, this is his answer, where he is now then sitting at the presidency and J. Van Dandel is the man I am referring to.

In association with my Amway endeavors I am looking forward to the time that I will be able to have involvement with the larger transportation facilities due to the port of Baltimore.

They sell, Amway I'm talking about, biodegradable detergents and I think the time is very closely approaching when all of your navigationable boats, especially the ones that are hauling fuels which have to take on water for ballast will be required before they discharge, whether it's inland close to a shoreline or out in the water, will be required to have a biodegradable detergent in that discharge in order to break down any possible oils that will be discharged at the same time and I think it would be a feather in my cap to be able to be instrumental in the gaining of that sales area.

Q. Did Mr. Freeman know that you worked for Amway?

A. He knows that I am associated or as I would say the vice president of an incorporated company which is known as Commodity Marketing Services.

Q. Which is affiliated with Amway basically?

A. Which is my vehicle which I use with Amway.

Q. That was helpful. Thank you.

At this time I would like to take some handwriting samples of yours and I'm basically going to give you a document which is a -- which has three areas on this paper and it's headed by check sample. On the bottom is a money order sample. I'm going to ask you to fill out the bottom of the money order sample with certain terms.

Where it says pay to the order of, I would like you to write there Citizens for LaRouche.

A. I have to look to spell LaRouche.

Q. And the sender would be yourself and your address. You can put the date and also sign your name.

A. Now, I am signing my full name here which is not always the way I do things. Sometimes I just sign Earnest without a K. Now this is a sample of something that my signature is supposed to be on and I don't think that you will ever find a sample of that with my signature on it because that form does not look familiar to me at all.

Q. I'm going to have the court reporter mark this as Exhibit 1.

(The money order sample referred to above was marked Pulsifer Exhibit No. 1.)

BY MR. BOGIN:

Q. Is this document which has been marked Pulsifer 1 the document that you just finished making out?

A. Yes, this is the document. I don't know what this

is.

Q. That's the court reporter's signature. I'm going to ask you to do it again. At this time instead of printing out Citizens for LaRouche, would you write that in script, and could you use this ballpoint pen?

MR. DeVOE: Can we go off the record?

MR. BOGIN: Sure.

(Discussion off the record.)

BY MR. BOGIN:

Q. Mr. Pulsifer, how do you ordinarily fill out a document that you are filling out now? Do you print or write cursively?

A. I would write, print or lettering, whichever term you like.

Q. For the purposes of this sample, would you please write cursively, script?

A. Same thing?

Q. Yes, Citizens for LaRouche.

A. Okay, and my name in cursive?

Q. Yes, everything in cursive, please.

A. (Witness complies.)

Q. Could you put down Baltimore, Maryland also, or Glen Burnie, whatever your address is?

A. (Witness complies.)

Q. And sign your name and date it.

A. (Witness complies.)

Q. It seems that you write slower cursively than you do printing. Is that why you like to print better?

A. I am also trying to make it legible for you so that you can read it.

Q. Well, I'm going to ask you to do another one after this and I would like you to do it in your normal everyday quick illegible handwriting.

A. If it's going to be the way I normally do things --

Q. Yes, I would like it the way you normally do things.

A. I don't, you know, do it in cursive.

Q. By the way, have you had occasion to fill out any money orders in the last year or so?

A. Yes, I did fill out a money order. It had nothing to do with this. I don't remember what it was about.

Q. Do you remember how much it might have been for?

A. No.

Q. Or what the purpose was or when it was?

A. It was a draft on, what do you call it, a post office money order is about the only thing I can remember.

Q. All right, let's mark that.

(The money order sample referred to above was marked Pulsifer Exhibit No. 2.)

THE WITNESS: Now this is the way I usually type

things out. I like detail. Here we go. Here are some things in hand script and you will see it's all a mess of letters.

BY MR. BOGIN:

Q. Are these documents that you need?

A. I don't know. I really didn't look at them to see what they were. I was just looking for samples of my handwriting.

Q. I would like you to verify the document marked Pulsifer 2 as the document you just filled out cursively.

A. Yes.

Q. Here is one more to do the same thing, and write it illegibly, any way you like, but your normal script, Citizens for LaRouche.

A. (Witness complies.)

Q. Thank you. Let's mark that Exhibit 3.

(The money order sample referred to above was marked Pulsifer Exhibit No. 3.)

BY MR. BOGIN:

Q. Just to verify that sample 3 was the document that you just filled out.

A. Yes.

Q. By the way, do you ever spell your name other than Pulsifer with the E-R, do you ever spell it O-R?

A. No, I never spelled it O-R, but I did notice it

on your subpoena that you spelled it O-R and in fact, I think I mentioned that to you in our telephone conversation.

Q. Do you know another Earnest K. Pulsifer?

A. The name Pulsifer is very rare. There are very few of them. To the best of my knowledge, everyone is on the East Coast of the United States is a relative and those you can count on both hands.

Q. And there is no Earnest K.?

A. There is no Earnest K.

Q. To the best of your knowledge, I'm going to ask you to fill out another one and I would like you to print it again.

A. Now, if I was going to print it and print it slowly so that somebody would have it in order to read it fairly legibly, is that the way you want it or my normal printing?

Q. I would like the way you normally fill out a money order if you had occasion to fill out a money order.

A. All right.

Q. On this one, could you write Baltimore, Maryland instead of Glen Burnie, even though I know that is not your address.

A. I already wrote Glen Burnie.

Q. Then write Baltimore underneath that.

A. (Witness complies.)

Q. Before when I was asking you questions, you said that Mr. LaRouche owned the publishing house, the New Benmain Franklin House, is that correct?

A. That's what I've been informed of.

Q. Who informed you of that?

A. Freeman.

Q. New Solidarity International Press Service?

A. As far as I know, that's just another name for the Benjamin Press.

MR. BOGIN: I would like this sample marked 4.

(The money order sample referred to above was marked Pulsifer Exhibit No. 4.)

BY MR. BOGIN:

Q. Could you just sign that and then I will ask you to do one more a little differently and then that will be the last one.

A. (Witness complies.)

Q. All right, on this one I'd like you to do Citizens for LaRouche and write your name instead of E-R with an O-R.

A. You wouldn't pick it up in the signature. You might pick it up in the direct spelling, is that what you want?

Q. I would like you to sign it as if it were O-R and write it as if it were O-R. Just do it as if your name

happened to be O-R.

A. Now, do you want this one Baltimore, Maryland or Glen Burnie?

Q. Baltimore.

A. Any particular zip?

Q. No, you don't need a zip in it. If you would, just sign your name with the O-R.

A. (Witness complies.)

MR. BOGIN: Let's mark that as 5.

(The money order sample referred to above was marked Pulsifer Exhibit No. 5.)

MR. DeVOE: I think you should indicate for the record that Mr. Pulsifer had a difficult time putting an O in his name.

THE WITNESS: I had to stop and figure out to make an O.

BY MR. BOGIN:

Q. Are you right-handed or left-handed?

A. Left-handed.

Q. Do you have occasion to write with your right hand ever?

A. I haven't written with my right hand since the age of 4 when my right hand was caught in a car door and was severely hampered and I at that time switched to my left hand and I have been writing dominantly with my left

hand ever since.

Q. Dominantly or exclusively?

A. Dominantly, I am for most talents ambidexterous, but I do not practice writing with my right hand.

Q. I have here a copy of an American Express money order, No. 55-466,938,424. I would like you to look at it and tell me who the payee for that money order is.

A. When you say payee, what are you referring to?

Q. Where it says to the order of, what is stated?

A. Citizens for LaRouche.

Q. And who is it signed by or what is the name there that denotes the signature of?

A. Somebody's interpretation of mine, I think.

Q. Does it say to the best of your ability, does that say Earnest K. Pulsifer?

A. Yes.

Q. Could you spell the last name that appears on that money order?

A. P-U-L-S-I-F -- it could be either an E or an O-R.

Q. Is that your signature?

A. No, it is not.

Q. Have you seen that money order before?

A. I'm not familiar with it at all.

Q. Do you have any idea how a money order to Citizens for LaRouche signed by you for $150 could have been issued?

A. I'm not familiar with this at all. I have no knowledge of it or anything else. I'm sorry, but I can't help you at all. I don't even see an area in which the thing was supposedly sent from.

MR. BOGIN: I would like this marked Exhibit 6.

(The American Express money order referred to above was marked Pulsifer Exhibit No. 6.)

BY MR. BOGIN:

Q. For the record, Pulsifer 6 is a money order and once more for the record, is that signature yours, Mr. Pulsifer?

A. No, it is not.

Q. And you have never seen that money order before?

A. No, I can give you the basics of how, the positiveness of it. When I sign my name I do not use a standard T. I use the old cursive T which is not crossed. The angle on which this is written might have been a left-handed person that signed it, but I don't slant my lettering in the same way that a normal left-handed person is noted for slanting it. I slant it -- whoever wrote this may be because I have a number of friends that are left-handed is one that has written over top of his handwriting, whereas I myself slant the paper and write always underneath.

Q. Okay, thank you very much. For purposes of a handwriting sample why don't you fill out one more of these

trying to use your right hand.

A. That's ridiculous.

Q. Do the best you can.

A. I used to do this as a kid just for the fun of it and I didn't realize that my right hand handwriting had gotten so lousy.

In regards to these yellow sheets here, let me look over them a minute and familiarize myself with them. That might be something that was just the basis for something I typed up later. If it is, then you can go ahead and have them.

Q. I'd appreciate it. We can make a copy for you, too.

A. Well, whatever. Those are simply notes of mine.

Q. All right, Mr. Pulsifer, that's fine. You don't have to complete that. I would like this marked 7.

(The money order sample referred to above was marked Pulsifer Exhibit No. 7.)

BY MR. BOGIN:

Q. Mr. Pulsifer, I have before you now sample 7 which is handwriting done with your right hand, and for the record, it should be noted that you took a long painstaking time in writing that.

By the way, when you got or when you made those contributions, did Mr. Freeman remark about the fact that it

was in cash?

A. Nothing that I really basically recall. I think at one time there was something about a remark that most contributions are accepted by check, but that's about it.

Q. I would like to remind everybody that this is an investigation undertaken pursuant to 2 U.S. Code, Section 437G. It's confidential. The confidentiality provisions mean that you should not talk about it with anybody else. If you would waive signature on this, we can send you a copy of the deposition if you so like, once we get it.

MR. DeVOE: That will be fine.

MR. BOGIN: Thank you very much for your cooperation.

(Examination concluded.)

* * * * * * * * * * * * *

STATE OF MARYLAND

COUNTY OF HOWARD, SS

I, LAWRENCE F. ST. YVES, a Notary Public, in and for the State of Maryland, County of Howard, do hereby certify that the within named EARNEST K. PULSIFER personally appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulation contained herein was entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

AS WITNESS, my hand and Notarial Seal this 19 day of August, 1980, at Baltimore, Maryland.

Lawrence F. St. Yves
NOTARY PUBLIC

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19___

BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Pulsifer
7/22/80

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

MONEY ORDER SAMPLES

PAY TO THE ORDER OF Citizen's For LaRouche

DO NOT PAY OVER $100.00

SENDER Ernest K. Pulsifer

SENDERS ADDRESS 209 2nd Ave S.E.

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

7-23-80 Ernest K. Pulsifer

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Publisher 2
11/23/80
J.G.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for LaRouche

SENDER Ernest K Pinkerton

SENDERS ADDRESS 209 Second Ave S.E.

PAY THE SUM OF Glen Burnie, MD

DO NOT PAY OVER $100.00

DOLLARS	CENTS

DOLLARS

7-22-80 Ernest K Pinkerton _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Pulsifer 3
7/23/80
J.S.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens' Fed. La Crosse

SENDER Ernest L. Bucker

SENDERS ADDRESS 2009 2nd Ave S.E.
Glen Burnie, MD

PAY THE SUM OF _____

DO NOT PAY OVER $100.00
DOLLARS | CENTS
DOLLARS

7-22-80
DATE

AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Pulsifer 4
1/23/80
Ltr

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens' For La Rouche, Inc

SENDER Ernest K Pulsifer

SENDERS ADDRESS 209 2nd Ave, S E, Glen Burnie, MD

PAY THE SUM OF Baltimore, Maryland

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

1-23-80 _____ _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Pulsifer 5
7/23/80
DC

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

Writer's Initials _____ Date _____

PAY TO THE ORDER OF CITIZENS FOR LaROUCHE, JR

SENDER ERNEST K PULSIFER

SENDERS ADDRESS 209 2ND AVE, S.E. BALTIMORE, MD

DO NOT PAY OVER $100.00

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

7-23-80 Ernest K Pulsifer _____

DATE AUTHORIZED SIGNATURE NO.

CHECK SAMPLE

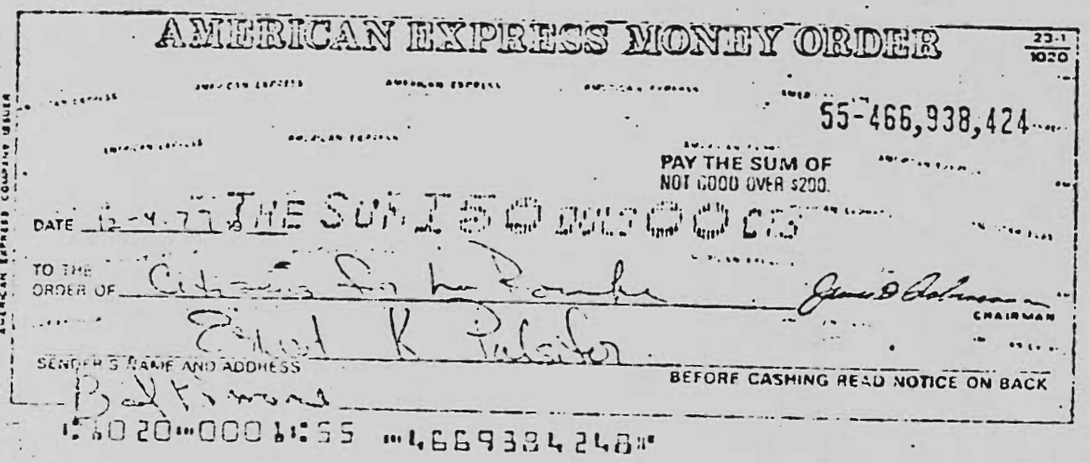
FIRST NATIONAL BANK _____ 19____

ATTACHMENT #5

page 7

Pulsifer 6

12-4-79, 1-1



3577

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF: :

MUR 1158

- - - - - -

Pursuant to notice, the deposition of NANCY RADCLIFFE, was taken on Friday, August 15th, 1980, commencing at 10:00 o'clock a.m., at the United States Attorneys Office for the District of Maryland, 8th Floor, Federal Court House, Baltimore, Maryland, 21202, before Phyllis Goldstein, a Notary Public.

- - - - - -

APPEARANCES:

Robert I. Bogin, Esquire,
On behalf of the Federal Election Commission

Marsha Gentner, Esquire,
On behalf of the Federal Election Commission

Peter Parker, Esquire,
On behalf of Witness, Nancy Radliffe

Also Present:

Debra H. Freeman
Felice Gelman

Reported by:

Phyllis Goldstein

PENSAD CO., BAYONNE, N.J. 07002 - FORM 740

I N D E X

WITNESS:	PAGE
Nancy Radcliffe	3

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

PROCEEDINGS

MR. BOGIN: This will be the deposition of Nancy Radcliffe. Before we start, but for the record, we have Nancy Radcliffe and Peter Parker, her attorney; Debra Freeman; and Felice Gelman. The deposition is for Nancy Radcliffe, and Mr. Parker represents her. It is the position of the Federal Election Commission that both Ms. Freeman and Ms. Gelman will not attend the taking of this deposition. Apparently, they would like to place a statement on the record why they should be.

MR. PARKER: Before that happens, what is the basis of your decision or position that they cannot be here?

MR. BOGIN: Well, we are an investigatory agency. We would like to take the deposition of Ms. Radcliffe and get it for the record. She is only a witness. There is no need at this time, there is no place in our Act or at this investigatory stage for confrontation by the respondent, or certainly, I don't even know why Ms. Gelman is here. I assume she represents Citizens for LaRouche. They are not a party to this action at this point in time, if ever. Certainly, it's not appropriate for her to be here. Ms. Freeman is not to be here either; but, of course, you are her attorney. You will be able to because you represent Ms. Freeman and the witnesses, and you certainly will have access to the deposition - testimony.

MR. PARKER: Well, my point is this. As far as Ms. Freeman is concerned, she has been delineated as the target or the subject of the investigation MUR 1158, which is why we are here for this deposition. It seems to me, under the Constitution, there is the right to face your accusers. She is entitled as a matter or process to be present, and I can't see what possible difference it would make, is she is free to read a copy of the deposition following its transcription, why cannot she be here to hear what is being said?

MR. BOGIN: I didn't say she would be free to read the deposition. It is because you are the attorney she is going to have access to this information. However, we are an investigatory agency. This due process argument, it is not like we are in Court or have made a civil action. This is part of the investigation.

We have run across -- we have been upheld in this position in a recent case in New Hampshire in the Federal Election Commission versus Dudley, which said any investigatory agency can depose an individual without any other people in the room besides her attorney.

MR. PARKER: Well, you are saying that, for the record, that the Citizens for LaRouche is not a subject of this investigation?

Mr. BOGIN: There have been no findings at

REPORTING CO., BAYONNE, N.J. 07002 - FORM 740

this time concerning Citizens for LaRouche. The only finding at this time has been MUR 1158 where there was proper finding and notification given to Ms. Freeman.

The other people here are not subjects of an inquiry, per se, at the moment.

MR. PARKER: As far as Citizens for LaRouche is concerned, you are saying the subject of this inquiry does not involve them. It involves Ms. Freeman.

MR. BOGIN: While it may eventually lead to them, that is part of why we are investigating, but certainly there has been no finding at this time.

This is Ms. Gelman, Treasurer of the Citizens for LaRouche.

MS. GELMAN: Let me indicate my view on the situation, which is the following: Mr. LaRouche's contributors, both in this campaign and in his campaign in 1976, which I was not personally involved in, have repeatedly been the target of broad-scale inquiry by the Federal Election Commission.

That inquiry has not been limited to one or two individuals. It has been on a broad scale. The Federal Election Commission contacted over 200 of the Citizens For LaRouche contributors during this campaign.

They paid surprised, unannounced visits by investigators in 1976 to contributors.

DIGITAL CO., BAYONNE, N.J. 07002 FORM 740

As Treasurer of the Citizens for LaRouche, I am well aware of the fact that the sweep and scope of the FEC's inquiries, most of which were not really being targeted towards any particular investigation as far as I am able to discern, have had a remarkably chilling effect on our ability to recruit political contributors and recruit political volunteers, all of whom tend to believe at this point, that should they make a contribution to Citizens for LaRouche, they will become the subject of inquiry, investigation; that they may be called to answer questions; that they may be deposed.

Now, in this situation, there are four individuals who have been repeatedly called, have been required to take time off from their employment to attend a deposition as witnesses in a matter which in fact concerns the submission of their contributions for matching funds.

Citizens for LaRouche was never notified that these people were being contacted. In fact, it has affected their relationship to the campaign and their willingness to make further contributions or to provide any additional support to Mr. LaRouche, and I think that particularly, in a case where the FEC is saying that Citizens for LaRouche is not a target of the investigation, that we have the right to determine how the FEC is actually conducting

themselves toward our contributors so that we have some ability to take care of the evil effects of their interest in such a large number of people so far.

I would also like to point out that there is litigation going on concerning the FEC's approach to Mr. LaRouche's contributors, which stem from the 1976 campaign, and the guidelines, approach, subject matter, et cetera, their investigation and its effect upon the contributors is a matter that is under litigation in the case.

Now, we are not talking about a current matter, but we are talking about the approach the FEC has taken to Mr. LaRouche. I think we have an interest in safeguarding their privacy and insuring that the FEC does not conduct itself as it did then in harassing people and causing them undue problems. That is really our interest in attending the deposition.

MR. BOGIN: The Federal Election Commission is charged with the responsibility of enforcing the Federal Election Campaign Act of 1971 as amended that gives it broad powers, but in a certain confined procedural process which it must follow. The Commission has made a finding of reason to believe concerning an individual, and it can pursue that violation to the extent necessary. It is recognized that sometimes this will have certain effects, but the Commission must proceed to enforce and to uphold

its responsibilities under the law.

We try to do this in a manner that brings in and involves the fewest number of people, tries to be concise, tries to do everything it can to make sure it does not harass or unduly burden any individual. In this matter, there was a finding of reason to believe with a full notification of why, and --

MS. GELMAN: But Citizens for LaRouche is not responsible for that.

MS. GENTNER: He didn't interrupt your statement. Please don't interrupt his.

MR. BOCIN: There has been no objection by the respondent or her attorney that we are going outside the scope of the relevancy of our investigation for that matter, and that is why we are now going to proceed with the deposition of the witness. Citizens for LaRouche has no place at this deposition.

MS. GELMAN: I have no objection whatsoever to your proceeding with the investigation, and that is not the reason I said I wanted to attend it. I wanted to attend it because it's a matter of the First Amendment involved in the relationship between us and our contributors. There is nothing wrong with the FEC pursuing its investigation. There is nothing wrong with them questioning people, but there has been a history of past practice which has

PEGGAR CO. BAYONNE, N.J. 07002 - FORM 740

developed an attitude among our own contributors, and that's my interest in the matter.

MR. BOGIN: There are confidentiality provisions in our Act.

MR. PARKER: But that only relates to Mrs. Freeman, who is waiving.

MR. BOGIN: And it also relates to the Federal Election Commission, who has not waived its right for keeping this matter confidential, and in fact, it is imperative in its investigation that it have confidentiality in its investigations; otherwise, we would just not be an effective agency.

MR. PARKER: Well, it is your position that you refuse to go forward with the deposition if Felice Gelman and Debra Freeman remain right here?

MR. BOGIN: That's right.

(Felice Gelman and Debra Freeman were excused from the deposition, and a brief off-the-record discussion was held.)

- - - - - -

FLORIO CO., BAYONNE, N.J. 07002 - FORM 240

NANCY B. RADCLIFFE,

a witness, called for examination by the Federal Election Commission, after having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MR. BOGIN:

Q May we have your full name for the record?

A My name is Nancy Bowie Radcliffe.

Q And how do you spell Radcliffe?

A R-a-d-c-l-i-f-f-e.

Q And your present address?

A 308 East 31st Street, Baltimore, Maryland, 21218.

Q How long have you lived at this address?

A Seven months.

Q And before that time, what was your address?

A 3215 North Charles Street, Apartment 206, Baltimore, Maryland, same zip code.

Q And your occupation?

A Administrative Secretary.

Q What is your place of employment?

A Johns Hopkins.

Q How long have you held that position?

A Five months.

Q And before that time, what was your occupation -- I mean -- your principal place of business?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

A The Baltimore Sunpapers.

Q What was your job with the Baltimore Sunpapers?

A Computer data entry.

Q You didn't sell papers?

A No.

Q You worked for the headquarters, the main office of the Baltimore Sunpapers?

A Yes.

Q Is that located on Calvert and Charles Street?

A It's on Calvert and Centre Streets.

MR. PARKER: Calvert and Charles are parallel.

Q And how long were you working for the Baltimore Sunpapers?

A For a year, one year.

Q Do you know of, or know a man named Lyndon LaRouche?

A Yes.

Q How do you know him?

A Through reading literature he has written. Through watching television broadcasts.

MR. PARKER: When you say know, do you mean know him personally?

MR. BOBIN: Know of him or know him. We will develop what that means.

A Okay, thank you. How I know him.

Q Through literature and television broadcasts?

PENNEE CO. BAYONNE, N.J. 07002 - FORM 760

A Yes.

Q You have never met the man?

A No. I have, yes.

Q When was the first time you heard of him? Do you remember approximately what year you heard of him?

A 1974.

Q And in 1974, how did you come to hear of him?

A The same way.

Q Through reading literature?

A Correct.

Q Did anybody give you that literature? How did you come across the literature?

A I bought the literature on LaRouche, and somebody gave me the literature on LaRouche in '74.

Q '74?

A Un-huh.

Q Do you know what Mr. LaRouche is doing in the year 1980?

A He campaigned for the President of the United States.

Q Did you work for his campaign?

A I volunteered; yes.

Q How much time, would you say, a week did you volunteer?

A It varied.

Q Give me some approximations.

PIGOTT CO., BAYONNE, N.J. 07002 - FORM 740

A Some weeks a few hours. Some weeks more hours. It varied, depending on my work schedule.

Q Did you ever work 40 hours a week for him at any stage of this?

A No.

Q Twenty hours?

A Maybe twenty.

Q How did you come to volunteer for him? Were you recruited?

A What do you mean, recruited?

Q Did somebody come and ask you to help volunteer for the campaign?

A No, I volunteered for the campaign.

Q Who did you volunteer to? Who did you contact?

A His campaign staff.

Q Could you tell me who the campaign staff is? Who personally did you contact in the campaign staff?

A Several people.

Q Can I have some names?

A Of the campaign staff?

Q Right, that you contacted?

A Well, for one, are you talking about 1980, or are you talking about --

Q 1980.

A 1980; Lawrence Freeman, Debra Freeman and several others.

PETKUS CO., BAYONNE, N.J. 07002 - FORM 740

Q So when you wanted to volunteer your time, did you call up Mr. Freeman and say, "I would like to volunteer my time"?

A No. I just volunteered my time. It was not formal -- you know -- I call up and say, I want to volunteer my time.

Q How do you know Mr. Freeman?

A How do I know Mr. Freeman. I have known him through the campaign. Since, you know, I have known LaRouche.

Q From 1974?

A Yes. I have known him for a while.

Q Where is the campaign headquarters in Baltimore.

MR. PARKER: Was.

A Was. Well, LaRouche himself did not have a campaign headquarters. We met in different places.

Q When you did work, what kind of work did you do for the Committee?

A Campaign work, you know, petitioning, leafleting.

Q Did you solicit contributions?

A Yes, at times.

Q Did you receive contributions from individuals?

A Yes, occasionally.

Q When you received a contribution from an individual, what did you do with the contributions? Who did

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

you give it to?

A To our New York office.

Q You sent it up there directly to New York?

A Well, I'm just trying to remember. I don't remember.

Q Did you ever send it up directly to New York -- contributions that you received?

A Yes. There were times when I did, yes.

Q Where would you go from there, physically, where was your --

A From the Post Office, Central Post Office down here.

Q Give me a scenario of what happened, this collection of contributions. You would receive a contribution from somebody who was interested in contributing to the LaRouche campaign?

A No, my main job as a volunteer was to disseminate campaign literature.

Q Who would give you the literature to --

A I would get the literature.

Q From whom?

A From campaign workers and other volunteers. There are many volunteers.

Q Do you know Debra Freeman?

A Yes, I know Debra.

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

Q How long have you known Debra Freeman?

A I have known Debra since either '74 or '75.

Q Have you ever made any contributions yourself to the Lyndon LaRouche campaign?

A Yes.

Q How many have you made?

A I don't remember.

Q Approximately.

A Approximately four, five.

Q Totaling about how much money?

A I don't remember.

Q Approximately.

A I don't remember.

Q In what form did you make these contributions?

A Different forms.

Q Did you make contributions by personal check?

A Yes.

Q By money order?

A Yes.

Q Do you have a checking account?

A Yes.

Q Is this checking account in your own name?

A Yes.

Q Approximately how much money do you make in a year?

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

A I would like to talk to my lawyer. I am not going to answer that.

Q Could you tell me why you are not going to answer that?

MR. PARKER: I instructed her not to answer it. That is why. It has nothing to do with the subject of this investigation.

MR. BOGIN: Well, the Federal Election Commission has asked the question of approximately how much money the witness makes in a year. It is relevant in the sense of determining her capacity to make contributions.

Based on that explanation, do you still refuse to answer the question?

MR. PARKER: Yes. She makes considerably more than the contributions which she made.

MS. GENTNER: Is that the witness' answer?

A Yes. That is my answer.

Q When you made a contribution to Citizens for LaRouche, who did you give the contribution to?

A I don't remember.

Q Did you ever give cash contributions to Citizens for LaRouche?

A Yes, I gave cash and check contributions.

Q I have here a money order, Traveler's Express Money Order, payable to Citizens for LaRouche in the amount

of $250. Do you recognize this money order?

A That is the contribution I made in cash to Citizens for LaRouche.

MR. BOGIN: I would like to mark this Traveler's Express Money Order No. 2926722, payable to Citizens for LaRouche for $250 as Federal Election Commission Exhibit No. 1.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Federal Election Commission Exhibit No. 1.)

Q And who did you give this $250 to, this cash contribution?

A I gave it to Debra Freeman.

Q And why did you give her $250 in cash?

A Because I didn't have $500 in cash.

Q Why didn't you write out a check?

A Because I had the cash.

Q Is this your handwriting on this money order?

A No.

Q That is not your signature, Nancy Radcliffe?

A No.

Q In fact, is Nancy Radcliffe spelled correctly?

A No.

Q What is the misspelling?

PESCAD CO., BAYONNE, N.J. 07002 - FORM 740

A There is no "E" on the end. That is a common mistake.

Q Have you ever seen this Traveler's Express Money Order payable to Citizens for LaRouche before today?

A Yes.

Q When did you see it?

A When I made the contribution.

Q Could you explain the transaction, how it occurred?

A I explained it.

Q No, you didn't. You said you made a $250 cash contribution.

A And I gave the money to Debra Freeman. Debra Freeman got a money order.

Q Did you go to the bank with her to get the money order?

A No.

Q When did you see the money order?

A After she got the money order.

Q The same day that you gave her the $250?

A I don't remember if it was the same day.

Q How come you didn't fill it out if you saw the money order?

A I don't remember.

Q When did you see the money order?

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

A I told you, after I gave her the money.

Q But not the same day?

A I don't remember.

Q And it was filled out when you saw it?

A Yes.

Q Why was it that you saw the money order? Why did Ms. Freeman show it to you?

A I don't remember.

Q How do you remember seeing it?

A I remember seeing it when other checks and money orders, campaign contributions.

Q To be sent up to Citizens for LaRouche in New York?

A Right, correct.

Q So, did you mail this money order up to New York?

A I don't remember.

Q Let's go over the testimony. Did you give Ms. Freeman the $250 in cash?

A Yes.

Q Then this was intended as a contribution to Citizens for LaRouche?

A Right.

Q Ms. Freeman went out and purchased this money order herself?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Correct.

Q How do you know that Debra Freeman bought the money order?

A She told me she did.

Q When you gave her the $250 in cash, did she say, "I am going to go out and buy a money order"?

A Yes.

Q Why didn't you go out and buy the money order?

A I don't remember.

Q I have in front of me two personal checks signed by Nancy B. Radcliffe and Nancy Radcliffe, numbers 234 and 235. Do you recognize these two checks?

A Yes.

MR. BOGIN: I would like to mark this Deposition Exhibit No. 2, No. 234 and 235 that has the name of Robert Primack on it and the address of 3215 North Charles Street.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Deposition Exhibit No. 2.)

Q Looking at these checks, I see your name is printed on the top.

A Uh-huh.

Q Could you explain?

PHOENIX CO., BAYONNE, N.J. 07002 - FORM 740

A I printed my name on the top.

Q Was this a joint account?

A Yes.

Q It was your funds in this account?

A Yes.

Q Before, you said you were living at 3215 North Charles Street, and that is the address that is on the check?

A That is correct.

Q Who is Robert Primack?

A Who is he?

Q Yes, I mean how do you know him?

A I know him through the campaign.

Q Is he a campaign worker?

A I don't know.

Q What does he do for a living?

A I don't know.

Q How do you know him through the campaign?

A I met him through the campaign.

Q Doing what?

A Campaigning.

Q And then you lived in the same house that he did?

A That is correct, same address.

Q At the same address. Was it a group house?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

A It is at the same address.

Q You cannot tell me if he works for the campaign?

A I don't know.

Q But you lived at the same address?

MR. PARKER: When you say work for the campaign, do you mean as an employee?

A Do you mean now?

Q At the time that you made this contribution and we living at the same address.

A At the time I made the contribution, he was workin for the campaign.

Q Do you know if he was a paid worker for the campaign?

A I don't know.

Q Was he a volunteer?

A Yes.

Q Was there a central location where you could meet other volunteers for the Citizens for LaRouche Campaign?

A In Baltimore?

Q In Baltimore.

A We met in several places.

Q Could you tell me those places?

A We met in churches, we held some meetings. I remember some at the University of Baltimore, some at different campuses, at Hopkins, several places.

PENN'S CO. BAYONNE, N.J. 07002 - (201) 436-7400

Q Did you ever meet at people's homes?

A Yes.

Q Did you ever meet at 3215 North Charles Street?

A No.

Q Did you ever meet at the Freeman's residence?

A Maybe once or twice.

Q Where were the files that --

A I don't know.

Q You said before that you sent contributions to New York. There must have been files associated with that. Where were they kept?

A Associated with mail? I don't know.

Q Well, I want to talk about these contributions you sent to New York. Did you just send checks or did you send contributor information?

A I said there was only an occasion or two when I did, and it went express mail.

Q Where did you pick up the contribution from?

A Where did I pick up the contribution? In my campaigning.

Q In your campaigning. In the street somebody would give you a contribution.

A That would happen, yes.

Q Did you have to get contributor information from that person like their name, their address?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I had their name and their address.

Q Did you ever have to find out where they worked?

A No. The contributions weren't large enough, but I did find out information like that.

Q Did you send that to New York, that information?

A I don't remember.

Q So, you got contributions on the street, and then you went to the Post Office with it and sent it to New York?

A Sometimes.

Q And what about those other times? Would you ever tell anybody in Baltimore that you got a contribution?

A I would tell campaign workers.

Q Would you tell Debra Freeman?

A Yes.

Q Would you tell her on every contribution that you got?

A I don't remember.

Q Would you tell Larry Freeman?

A Sometimes.

Q Would you tell Robert Primack?

A Sometimes.

Q Do you know Kevin Salisbury?

A Yes.

PENLAD CO. BAYONNE, N.J. 07002 - FORM 740

Q Is he a campaign worker?

A He is a campaign contributor.

Q But you wouldn't classify him as a volunteer for LaRouche?

A He has done some work, yes -- not much.

Q How about David Sanders.

A I know David Sanders.

Q Is he a volunteer for LaRouche?

A No.

Q Charles Clark. Do you know him.

A Yes.

Q Is he a contributor?

A Yes.

Q Is he a volunteer for Citizens for LaRouche?

A He does some work, not much.

Q How do you know that Charles Clark is a contributor to Citizens for LaRouche?

A How do I know?

Q Uh-huh.

A Because I know him as a contributor.

Q Did he give you a contribution?

A No, not that I remember.

Q So what was the basis for knowing that he was a contributor?

A He told me.

PETRAD CO., BAYONNE, N.J. 07002 - FORM 740

Q He told you that he was a contributor?

A Yes.

Q What about David Sanders? How do you know he was a contributor to the Citizens for LaRouche?

A The same way.

Q He told you?

A Uh-huh.

Q These conversations where they told you, when were they?

A I don't remember.

Q Is all the money that you contributed to Citizens for LaRouche your own money?

A Is the money I contributed to Citizens for LaRouche my money? Of course.

Q Have you ever heard of a matching funds program?

A Yes.

Q Are you instructed -- have you ever been instructed on how to get contributions for Citizens for LaRouche?

A On how to get contributions.

Q What information you must get from a contributor? How much you may accept?

A Yes.

Q And who gave you those instructions?

A I guess Debra, other campaign workers.

PEGASO CO. BAYONNE, N.J. 07002 - FORM 740

Q Debra Freeman and others?

A Uh-huh.

Q Were they ever written?

A I think I recall that they were, but I don't remember. I think they were.

Q Before today, had you ever met Felice Gelman?

A Yes.

Q When was the first time you met her?

A Several years ago.

Q Have you ever received money from Debra Freeman?

A Have I received money from Debra Freeman? No.

Q Have you ever received money from Larry Freeman?

A No.

Q Have you ever received money from Robert Primack?

A No.

Q Have you ever been reimbursed for making a contribution?

A No.

Q Did Ms. Freeman tell you to get Peter Parker as an attorney?

MR. PARKER: I object. I instruct the witness not to answer.

MR. BOGIN: Could you give me the basis, please?

MR. PARKER: You cannot inquire into how she came

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

to retain an attorney.

MR. BOGIN: I think it is relevant in terms of the fact that the respondents in this matter --

MR. PARKER: I am instructing the witness not to answer. I have never heard of such an incredible question.

Q Do you refuse to answer the question?

A Yes.

Q Are you paying Mr. Parker to represent you?

MR. PARKER: Objection. I instruct the witness not to answer.

MR. BOGIN: What is the basis for the objection?

MR. PARKER: The same. You cannot inquire as to the relationship between a client and an attorney.

Q Do you refuse to answer that question?

A Yes.

(Whereupon a brief off-the-record discussion was had.)

MR. BOGIN: Back on the record.

Q I show the witness Commission Exhibit No. 1, which is the money order for $250.

You said you testified before that, at the time you gave Ms. Freeman $250, she said she was going to buy a money order; is that correct?

A That is correct.

PENNAD CO., BAYONNE, N.J. 07002 - FORM 740

Q How come that is not your signature on this money order?

A You asked me that before.

Q Yes, and what was the answer?

A I said I don't remember.

Q Did you know that you were going to see this money order when she purchased it?

A I don't remember.

Q You do remember giving her the $250?

A Yes.

Q And you do remember her saying that she was going to purchase the money order?

A Yes.

Q And what else did she tell you at that time about purchasing the money order?

A That is it, that I remember.

Q Have you ever, subsequent to giving the $250, signed any document saying that you made a $250 contribution?

A Yes, I did. I think -- I am sure I did.

Q When?

A When? I don't remember the date.

Q Was it last month?

A No.

Q Two months ago?

PLIGAD CO., BAYONNE, N.J. 07002 - FORM 340

A I don't remember.

Q Well, let's see if you can remember.

MR. PARKER: Here is a copy of the letter she reportedly signed.

A That is my signature.

Q Off the record.

(Whereupon, a brief off-the-record discussion was had.)

MR. BOGIN: Back on the record.

Q Mr. Parker has given me a document which the Federal Election Commission does not have possession of, as far as I know, dated 2-28-80. The document says you contributed $250 for Citizens for LaRouche and in handwriting, on or about 9-10-79.

A This contribution was from my own personal funds and not drawn on an incorporated account.

Q It is signed Nancy B. Radcliffe, 3215 North Charles Street, Apartment 206, Baltimore, Maryland, 21218. I would like this to be marked Federal Election Commission Exhibit No. 3.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Federal Election Commission Exhibit No. 3.)

Q Before I asked you whether or not you signed any

PENGAD CO., BAYONNE, N.J. 07002 - FORM 746

documentation, and you said yes, but you didn't remember the date; does this refresh your memory, this document Commission Exhibit No. 3?

A Yes.

Q When did you sign this document?

A Well, the date is right there. February 20, '80.

Q How come six months after you made the contribution, you signed that paper?

A I don't remember.

Q How often did you see Debra Freeman in September, November, December, approximately? Would you see her twice a week?

A Yes.

Q More times?

A More times.

Q She was the only -- had Ms. Freeman purchased the money order for you?

A Yes.

Q Or she purchased the money order after you gave her the $250 in cash?

A Yes.

Q And she never came to you and said, "I need your signature"?

A Yes, she did, with this.

PENROD CO., BAYONNE, N.J. 07002 · FORM 740

Q In February?

A Yes.

Q When did you see this Traveler's Express Money Order?

A When I made the contribution.

Q Within a couple of days after?

A This is redundant.

Q Why didn't you sign it at that time?

A You asked me that three times already.

Q And what did you say?

A I said I don't remember why I didn't sign it.

MR. PARKER: The fact is that I don't think a person has to sign money orders, and I think the person who purchases the money order fills in the blanks, as near as I know.

Q Is this your handwriting here, "$250, 9/10/79". For the record, I am referring to Exhibit No. 3 -- whether or not the information before this signature is your handwriting.

A The signature is my handwriting.

Q What about the address?

A Yes.

Q Were you living there at that time?

A Yes.

Q Before, you testified that you had been living

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

at 308 East 31st Street for the last seven months.

A That is correct.

Q Well, this was done less than seven months ago.

A Well, I counted February, March, April, May, June, July, August. That is how I counted seven months.

Q Yes, but this is March 1st.

MR. PARKER: That is February 29th.

A That is February.

Q Right. It's one day from March. It is really five months ago.

MS. GENTNER: February 28 you stated you counted February as a month that you had been living at that address?

A This address I was still using at that time, because my checking account, my mail, et cetera, was coming to this address. I was residing at 308 East 31st Street since February, mid to late February.

Q Is this your handwriting with the address?

A That's my handwriting.

Q But the number up here, 2/28/80, the $250, and 9/10/79 are not?

A I don't know.

Q You don't recognize it as your handwriting?

A I don't remember.

Q Do you recognize it as your handwriting?

PEGAS CO BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: She has already said she couldn't.

A I said I don't remember.

Q Do you recognize this as your handwriting?

A Do I recognize this as my handwriting? It could be my handwriting.

Q Do you recognize it as your handwriting?

A I said it could be my handwriting.

Q It is not responsive to my question.

MR. PARKER: She said three or four times she doesn't recognize it as her handwriting. You just said that, "Do you recognize this as your handwriting".

MR. BOGIN: She has not said she doesn't recognize it as her handwriting. You just said that.

Q Do you recognize this as your handwriting?

MR. PARKER: Go back and read the answer to the first question.

(The pending question was read back by the reporter.)

Q You have not yet responded whether or not you recognized 2/28/80, $250, and 9/10/79 on Commission Exhibit No. 3 as your handwriting. Do you recognize that as your handwriting?

A I said I don't know. It could be my handwriting.

Q Who was the person who gave you this Commission Exhibit No. 3 to sign?

A Debbie Freeman.

Q What did she do, call you up and say, "I would like you to sign the document"?

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

A I don't remember.

Q Tell me the circumstances under which you signed this document.

A I signed them -- I signed the document. What do you mean, the circumstances? She showed it to me, and I signed the document.

Q So you remember her showing you the document?

A Yes.

Q And how did she get in touch with you?

A When I saw her.

Q You have seen this document before today, then?

A Yes.

Q The whole document and not just your name and address?

A Yes.

Q And you remember Ms. Freeman giving you this document to sign?

A Yes.

Q And you signed it?

A Yes.

Q And you put your address down?

A Yes.

Q But you cannot tell me whether or not you put these figures down?

A I don't remember.

PENNAO CO., BAYONNE, N.J. 07002 - FORM 740

Q By these figures, I mean Commission Exhibit No. 3, the figures about the signature.

MS. GENTNER: Why is it you are able to identify your signature, but you are not able to identify these? Why is it that you know that these figures, the zip code, are you figures that you wrote, but you cannot identify whether these numbers are in your handwriting on the same document?

A Well, because this is part of my, you know, my signature as I am going along and writing in the same -- you know -- one right after another.

MR. PARKER: Indicating her name and address.

A Right.

MS. GENTNER: So, you are saying you recognize this as being your handwriting?

A Yes.

MS. GENTNER: Do you recognize this as your handwriting? (indicating)

A I said I don't remember. That is not writing.

MS. GENTNER: Neither is the zip code.

A I don't remember.

Q We are going to go one more time through a scenario when you solicited or received a contribution. And the reason we are doing that is because you said there were various ways which you did it, and I don't think we fully got the various ways. I would like you to just give us a recitation of one way in which you solicited a contribution.

PLIMSOLL CO., BAYONNE, N.J. 07002 - FORM 740

A I would knock on people's doors, ask them for a contribution.

Q And then somebody would give you a contribution?

A Sometimes.

Q If they gave you a contribution in cash, would you accept it?

A Sometimes, yes.

Q When you got a cash contribution, what did you do with that?

A What did I do with a cash contribution?

Q Uh-huh.

A I turned it in with my other contributions.

Q Turned it in to who?

A To Debra Freeman.

Q Did you ever mail contributions directly to New York?

A Yes.

Q Did you ever send cash to New York?

A No.

Q Did you ever send money orders to New York?

A Yes.

Q Did you ever take cash contributions and convert it into money orders before sending it to New York?

A No.

Q Did you ever take cash converted into money orders

PENGAD CO., BAYONNE, N.J. 07002 - 1-800-631-6989

and give it to Debra Freeman?

A No.

Q Did you ever give cash to Debra Freeman and have her buy a money order with that?

A Yes.

Q How many times?

A As my contribution.

Q Any other times?

A No.

Q You are not aware of other people giving Debra Freeman cash to convert into --

A I don't know.

Q When you received cash, you gave it to Debra Freeman?

A Yes.

Q And what did she do with the cash?

A I don't know.

Q Is Debra Freeman a volunteer worker for the Citizens for LaRouche?

A Yes.

Q Is she in charge of the campaign in Baltimore, or is she one of the people in charge?

A One of the people. There are several.

Q You don't consider yourself one of the people in charge?

PENJAD CO., BAYONNE, N.J. 07002 - FORM 740

A No.

Q So you don't know what Debra Freeman did with the money she received from you?

A No, no.

Q But the usual way you proceeded was to give any contributions you received to Debra Freeman?

A Sometimes.

Q Who else would you give money to?

A New York.

Q You would send it directly?

A Yes.

Q And when you did that -- let's go through that scenario. You would receive cash, you would receive a contribution from somebody. Then, what did you do after that, if you were going to send it to New York? I would like to know the steps.

A I went to the Post Office and sent it to New York.

Q You just took the -- let's say it was a check. You took the check and went from the door to the Post Office?

A No, not from the door to the Post Office.

Q Well, I would like to know what steps you went through.

A I would take the contributions, and you know, combine them with other checks or money orders or whatever, that other people had had, and it would go express mail to

PENSAR CO. BAYONNE, N.J. 07002 - FORM 740

New York, and I would take them express mail to New York.

Q But these contributions didn't all come in the same day that you sent express mail?

A No.

Q Where did you keep them as they were coming in?

A Well, Debra Freeman kept some.

Q So, did you give them to Debra Freeman, the ones that you got and then --

A And then I took them to New York, yes.

Q And where did she keep them, the contributions.

A I don't remember.

Q Was there no central location where you would go to pick up contributions to mail up to New York?

A (Witness moves head from side to side indicating negative response.)

Q Where would Debra Freeman go to -- where would you meet Debra Freeman then, where would you meet to pick up contributions to send to New York?

A Several places.

Q Name them.

A Different people's homes different -- well, the places I named before where we held LaRouche campaign meetings.

Q And she would say, "Nancy, I have some contributions I would like you to send up to New York"?

PEGASUS CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q Did you send anything else other than contributions to New York?

A No.

Q Did you ever include in it, those contributions any contributor information?

A I don't know.

Q Have you ever seen this form, Commission Exhibit No. 3 in blank or with other people's names or figures on it

A Yes.

Q Did you ever send that up to New York, documents like Exhibit No. 3?

A I don't remember.

Q Do you remember sending anything other than checks or money orders up to New York?

A I don't remember.

MR. PARKER: Like what? What do you mean?

MR. BOGIN: Any documentation.

A I don't remember.

Q But you remember sending checks and money orders up.

A Uh-huh.

Q You remember sending cash up?

A No.

MS. GENTNER: No, you never sent cash?

PENNSYLVANIA CO. BAYONNE, N.J. 07002 - FORM 740

A No, I don't remember sending cash.

Q These people's houses that you would meet Debra Freeman, where she would instruct you to send contributions up to New York. Can you remember any of those houses?

A Different campaign volunteers.

Q Name one of those houses.

A Do I have to answer that?

MR. PARKER: The Freemans' house, I assume.

A I will name Debra Freeman's house.

Q So you would go to Debra Freeman's house and she would say, "Hey, I have got some contributions, and I want you to send them to New York"?

A Occasionally.

Q Were they ever already in an envelope?

A Sometimes.

Q What were the other times?

A Sometimes I put them in an envelope.

Q Which you got at Debra Freeman's house?

A I didn't send that many contributions to New York. This was very occasional.

Q How many would you say you sent?

A I don't remember, but it wasn't many. It wasn't a regular occurrence.

Q You were always instructed to send it up; you never did it on your own?

A Right.

PIGEON CO., BAYONNE, N.J. 07002 - FORM 740

residence?

A Linkwood Road, Baltimore.

Q And do you know which address in New York you sent it to?

A It was the Post Office to Post Office.

Q Who was it --

A It was express mail.

Q What was the addressee? Citizens for LaRouche?

A No.

Q It was not Felice Gelman, Citizens for LaRouche?

A I don't remember.

Q You sent out envelopes to New York? Sometimes you actually had to address the envelopes, and you don't remember the address?

A No. I didn't say I addressed the envelope.

Q You said you put them in an envelope and --

A Putting something in an envelope and addressing are two different things.

Q So, you never addressed any envelopes?

A No.

Q And you don't recall whose name was on the envelope you sent out?

A No.

Q But there was a Post Office Box?

A Yes.

Q To New York City?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

A It was express mail, Post Office to Post Office to New York City.

Q Express Mail, is that a service --

MR. PARKER: It is a service of the United States Post Office. It goes from one Post Office to the other. Guaranteed delivery, next day.

Q How often would you -- would it be once a month you would bring an envelope to the Post Office?

A I don't remember, probably not that often.

Q Not as often as once a month?

A Right.

MS. GENTNER: You remember that the envelope was addressed to a Post Office Box, and you remember it was addressed to New York, but you don't remember the name of the person or the entity that it was addressed to?

A No, I don't remember.

Q Did you work for Mr. LaRouche in 1976?

A Yes.

Q Was he running for President then, too?

A Yes.

Q Did you solicit contributions at that time?

MR. PARKER: That is outside the scope of this investigation. I instruct the witness not to answer. It is a waste of time.

Q When did you start working for the 1980 campaign?

PERSAD CO., BAYONNE, N.J. 07002 - FORM 740

A When Mr. LaRouche announced.

Q In early 1979?

A Yes.

Q Do you remember the month?

A I don't remember. It was early.

Q February or March?

A Early.

MR. BOGIN: I have no further questions. I would just like you to let you know there is a confidentiality provision associated with your testifying and under the Act, you are not supposed to discuss this matter. Since the Federal Election Commission wishes to keep this confidential, you should be apprised. You should know there are criminal penalties for talking about these matters that are confidential, which is between the Commission and yourself.

MS. GENTNER: And your attorney.

MR. BOGIN: And your attorney.

MR. PARKER: We have no further questions.

MR. BOGIN: Is it possible to waive signature on this deposition?

MR. PARKER: No, I think Ms. Radcliffe wants to sign this deposition.

MR. BOGIN: All right. Thank you very much.

NANCY B. RADCLIFFE

PENSAD CO., BAYONNE, N.J. 07002 - (201) 339-7400

(The witness was excused at 11:06 a.m.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, County of Baltimore, do hereby certify that the within is a true and accurate recording of the proceedings indicated.

_____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN THE MATTER OF *

MUR-1158

THE FEDERAL ELECTION COMMISSION *

* * * * * * * * * * * *

Deposition of ANN A. TAYLOR was taken on Wednesday, July 23, 1980, commencing at 11:50 o'clock a.m., at the offices of the United States Attorney, United States Courthouse, Baltimore, Maryland, before Lawrence F. St. Yves, a Notary Public.

APPEARANCES:

Hal Ponder, Esquire
Robert Bogin, Esquire
On behalf of Federal Election Commission

Reported by:

Lawrence F. St. Yves

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837 - 3027

I N D E X

Witness:		Page
ANN A. TAYLOR by Mr. Bogin		3

E X H I B I T S

Taylor Deposition Exhibit:		Page
No. 1	Money order sample	10
No. 2	Money order sample	10
No. 3	Money order sample	11
No. 4	Money order sample	12
No. 5	Statement	14
No. 6	American Express money order and contribution slip	17

* * * * * * * * * * * * *

ANN A. TAYLOR,

called for examination by the Federal Election Commission, being first duly sworn to tell the truth, the whole truth and nothing but the truth, testified as follows:

EXAMINATION BY MR. BOGIN:

Q. Would you give us your name for the record, please?

A. Ann A. Taylor.

Q. That middle initial A?

A. It's Adamson.

Q. What is your address?

A. 1304 John Street, 21217.

Q. And your occupation?

A. Housewife.

Q. So have you been employed or ever been employed?

A. Just from time to time, but not over a long period of time.

Q. Would you consider yourself retired in any way?

A. Heck, no, I don't call myself retired.

Q. I mean you would never consider yourself to tell somebody I am retired?

A. No.

Q. Are you married?

A. Well I've been married and widowed and divorced, so I've been through all the stages.

Q. Presently?

A. Presently I am single.

Q. And Adamson is your maiden name?

A. That's right.

Q. Have you ever heard of an individual named Lyndon LaRouche?

A. Yes, I have heard. What's his name?

Q. Lyndon LaRouche.

A. Yes, I've heard of him.

Q. What have you heard of him?

A. Well, once I lived in Bolton Hill and I saw a group of people stopping cars as I came across North Avenue off of the Jones Falls Expressway coming south, and found out they were a group of his people and so that was the first I sort of heard of him, and then the only other time really I ever had any thought of him was I was playing bridge at a stranger's house with a friend of mine and he was listening the whole time we were playing bridge to the television and Mr. LaRouche came on and I heard him talk then. That's about all I have ever known about him other than what you read in the papers, I would see ads and all of that.

Q. Do you know what Mr. LaRouche is doing presently?

A. He is running for President, isn't he?

Q. That's right.

A. I know enough to know that.

Q. So you know he is a candidate?

A. Yes, I haven't heard much about it actually lately, but was back in the spring that I heard.

Q. I would like to ask you did you ever make a contribution to his campaign?

A. Not to my knowledge. I mean unless some figurehead over there, no, not a thing.

Q. Why are you so sure you never made a contribution?

A. Because I'm quite sure because I write all my own checks and there is no check to LaRouche anywhere and I know I didn't.

Q. So you have a checking account?

A. Yes.

Q. Which bank?

A. American Safe Deposit and Trust.

Q. Would you have any occasion to write out a money order in the last year or so?

A. No, I don't think I've ever written a money order in my life.

Q. So as far as you remember you don't remember purchasing a money order in the last year?

A. No.

Q. For any purpose?

A. No, I can't think of any.

Q. Christmas present?

A. No, I just send a personal check to anybody.

Q. I'm going to ask you whether you know a list of individuals.

A. All right.

Q. Do you know an individual by the name of Debra Hanania?

A. I don't know her. Isn't that the child that ran on the Liberal Party or something for was it City Council or State Legislature?

I don't know her but the name I think I've seen because I am crazy about politics. I am a Republican. I'm always losing, but I'm still fighting.

Is that the child's name? I am not good on names either. I think she ran in my District for either the State Legislature or the City Council. I can't remember.

Well as a matter of fact, she might be the one who wrote me because I am president of a little Republican club to ask if she could speak and I'm not sure whatever happened about that. She never did speak.

Q. That would be the only contact you might have had?

A. Yes, I have never met her to my knowledge and I've just seen her name and I think she did write me to ask if she could talk to the Republican club, but I had a feeling it wouldn't be very good. They are quite reserved.

Q. Do you know an individual by the name of Debra

Freeman?

A. No, the other one ran I think but Debra Freeman I don't believe so, unless I know her down in Bolton Hill somewhere.

Q. What about an individual by the name of Lawrence Freeman or Harry Freeman?

A. Now, look, when I told you I went to play bridge because that's what come over my mind since you all asked me about this. I went to somebody's house and I ought to know his name but I don't. He owns a little Sutton Place grocery. Is his name Freeman?

Q. I don't know, but you don't know. This man doesn't strike a bell with you?

A. No, I'm not good with names. I will tell you that, but I don't remember.

I mean I went to play bridge that night and frankly, I can't think of the man's name right now that I even, you know, the name of the people that owned the house, but I don't think it was Freeman unless he is the one that owns the Sutton .

Q. Do you remember the address?

A. Yes, it's over on Lanvale Street, what they call the new part of Lanvale. I think they call it Lanvale Place.

Q. Is that in Baltimore?

A. Yes, in Bolton Hill.

Q. Do you know an individual by the name of Robert Primick?

A. No, not that I know of.

Q. Felice Gelman?

A. No.

Q. Do you know anybody who either worked for or volunteers his time for Lyndon LaRouche?

A. No, unless they do and I don't know it. No, I don't know.

Q. Have you ever heard of the U.S. Labor Party?

A. Sure.

Q. Do you know anybody who is associated with that group?

A. No, I don't know anybody personally.

Q. Do you know anybody else by the name of Ann A. Taylor?

A. No, I actually don't.

MR. BOGIN: Off the record.

(Discussion off the record.)

BY MR. BOGIN:

Q. Do you know anybody by the name of Ann R. Taylor?

A. No.

Q. I have in front of me a sample money order and also on the sheet is a check sample and an endorsement and address, but I'm only going to ask you to fill out the bottom of the

sheet that is marked money order sample.

In fact, the money order sample is divided into two parts with that bold black line and I would like you to fill out the bottom of that money order and where it says pay to the order of.

A. Yes.

Q. I would like you to write Citizens for LaRouche and then your name.

A. Wait a minute now. Let me see if I have a pen here.

Q. Here you are.

A. Citizens for LaRouche?

Q. Yes.

A. Is that all and capital R? Well, anyway, I am supposed to do it the way I do it?

Q. That's right.

A. Citizens for LaRouche?

Q. Right. Then where it says sender, write your name and your address. You don't need to put a sum in there.

A. (Witness complies.)

Q. And date it and sign it.

A. Do you mean date it as of today?

Q. Yes.

A. All right.

MR. BOGIN: Okay, I would like the court reporter to mark this as Exhibit No. 1.

(The money order sample referred to above was marked Taylor Exhibit No. 1.)

BY MR. BOGIN:

Q. Ms. Taylor, do you recognize Taylor 1, sample 1 as the handwriting sample that you have just written?

A. Right.

Q. Okay, I would like you to do the same thing on this piece of paper which is the same sample form as the one you just previously filled out.

A. Do you mean write the same thing?

Q. Write Citizens for LaRouche.

A. (Witness complies.)

MR. BOGIN: I would like to have this marked as Exhibit 2.

(The money order sample referred to above was marked Taylor Exhibit No. 2.)

BY MR. BOGIN:

Q. Do you recognize sample number 2 as the handwriting sample that you just filled out?

A. Yes.

Q. I am going to hand you another one and I am going to ask you to fill it out a little differently. It's the same form again. I would like you to fill it out for Citizens

for LaRouche once again, and your name and then when you get to the address I will have different instructions for you.

A. All right.

Q. Where it has your address, put down your number and street and Baltimore, the town and state, but no zip code this time.

A. (Witness complies.)

Q. And date it and sign it.

A. (Witness complies.)

MR. BOGIN: Let's mark that No. 3.

(The money order sample referred to above was marked Taylor Exhibit No. 3.)

BY MR. BOGIN:

Q. Mrs. Taylor, do you recognize sample number 3 as the handwriting sample you have just filled out?

A. Yes.

Q. Okay, this will be the last one. Here I would like you to fill out once again for Citizens for LaRouche, but I would like you to put your name down as Ann R. Taylor and sign it.

A. Well now, wait a minute. I'm putting down Ann R. Taylor and signing it with an A?

Q. Yes, sign your own name.

A. Put the address?

Q. Please.

A. How do you want this address?

Q. Whichever way you want to.

A. All right, I'm going to sign this with Ann A., who I am.

Q. All right, thank you for those samples. I would just like you to fill out a statement. I am going to dictate a statement, but let me ask you some questions first.

Were these handwriting samples that you gave me, first of all let me mark this 4.

(The money order sample referred to above was marked Taylor Exhibit No. 4.)

BY MR. BOGIN:

Q. Is Exhibit No. 4 the one that you just wrote out?

A. Yes.

Q. These four samples that you just filled out, were they done voluntarily?

A. Yes.

Q. And was there any coercion or any promises from me for you to fill them out?

A. I thought you were asking me to fill them out to help straighten out whatever is wrong out.

Q. So you didn't feel there was any coercion or promises for you to fill these out?

A. No.

Q. I would like to dictate a statement.

A. You sure have me going through so much stuff, good Lord.

Q. I'm going to dictate something to the effect that this was voluntarily furnished and you were not promised or coerced in any way.

A. Let me tell you that this is absolutely voluntary because I want to help in any way I can, but I think it's right hard to send a subpoena to somebody and ask them to go through all their stuff without telling a little more about what is the great thing.

Is it a mix-up? I know I haven't sent out a check. I told you that over the phone. That could have just been said in front of a witness.

MR. BOGIN: Off the record.

(Discussion off the record.)

BY MR. BOGIN:

Q. On that form that I gave you I would like you to write that I have voluntarily given samples of my handwriting to the Federal Election Commission. Such samples were obtained without any threats or promises, and would you please sign and date it?

A. (Witness complies.)

MR. BOGIN: Okay, would the court reporter mark this as Exhibit 5.

(The statement referred to above was marked Taylor Exhibit No. 5.)

BY MR. BOGIN:

Q. Mrs. Taylor, is Exhibit No. 5 a statement which I just dictated to you?

A. Yes.

Q. I have here a copy of a money order and some other statements dealing with contribution information made out to Citizens for LaRouche and signed with the name Ann R. Taylor at 1304 John Street, Baltimore, Maryland.

I would like you to take a look at this document, both the top and the bottom and I would like you to tell me whether or not you have ever seen that document before.

A. No, I certainly haven't. Do you mean this or this?

Q. This or that, anything on that page.

A. No.

Q. Could you tell me if that is your signature?

A. Down here?

Q. Yes, on the money order.

A. Right here?

Q. Yes.

A. No, that's not mine. I don't even make a T, you can see my T's are entirely different.

Q. Could you read what it says down there near the signature on the money order? It says Ann Taylor.

A. Yes, what do you mean?

Q. Is that your address?

A. It looks like almost 1307. Do you see that? My address is 1304, but this looks like 1307 to me.

Q. Okay, on the top slip which is contributor information.

A. That looks like Anne A., with an E. That I don't use and then 1304. I never put an E on my name.

Q. So on the top --

A. That's off right from the beginning. Now 1304 it looks like John, and there is no zip. Now down here --

Q. You're talking about the money order?

A. Yes, it looks like to me it's A-N-N-E and it's an R and then it looks like either 1307 or 1309 John Street. So it looks like a different address there on the money order to me.

Q. Let's go to the top of that sheet which talks about the contributor information. It says Anne R. Taylor, but that's not how you spell your name, is that correct?

A. It says Anne A. Taylor there, it looks like to me. It looks much more like an A there than here to me, but the Anne is spelled wrong. I spell it A-N-N and I never use E.

Q. You have never seen that top piece?

A. No.

Q. And you have never seen the money order?

A. No.

Q. And you have never purchased a money order from American Express?

A. No.

Q. To the best of your knowledge, have you ever bought a publication called New Solidarity, a newspaper?

A. No.

Q. Any booklets called Dope, Inc.?

A. No.

Q. Do you recollect in the recent past, in the last year or so somebody coming to your door and asking to buy certain publications?

A. No, all I can say is that there obviously is some mix-up. Does it matter whether I am on the record or off the record?

I'm just telling you all to help you. I'm sure this exactly shows me what I thought from the beginning. It's somebody else other than me. Now it might be somebody who knows who I am, but why would they do it this way? That's ridiculous.

I don't understand. On this money order it doesn't even look like 4 to me down here. It looks like 7 or 9 and this definitely looks like Anne R. Taylor.

Q. That's fine. I would just like to remind yourself and the court reporter that our investigations are confidential

STATE OF MARYLAND

COUNTY OF HOWARD, SS

I, LAWRENCE F. ST. YVES, a Notary Public, in and for the State of Maryland, County of Howard, do hereby certify that the within named ANN A. TAYLOR personally appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

AS WITNESS, my hand and Notarial Seal this 19 day of August, 1980, at Baltimore, Maryland.

Lawrence F. St. Yves
NOTARY PUBLIC

under 2 U.S.C., Section 437 of the U.S. Code and that we appreciate your coming here today.

A. I hope it's helped you. I definitely have said from the beginning that has nothing to do with me.

Q. Let's mark this last document as Exhibit 6.

(The American Express money order and contribution slip referred to above were marked Taylor Exhibit No. 6.)

(Deposition concluded.)

* * * * * * * * * * * * *

BRENNAN CO. BAYONNE, N.J. 07002 - FORM 740

STATE OF MARYLAND

COUNTY OF HOWARD, SS

I, LAWRENCE F. ST. YVES, a Notary Public, in and for the State of Maryland, County of Howard, do hereby certify that the within named ANN A. TAYLOR personally appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

AS WITNESS, my hand and Notarial Seal this 19 day of August, 1980, at Baltimore, Maryland.

Lawrence F. St. Yves
NOTARY PUBLIC

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Taylor
7/23/00
L.D.J.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for La Prade

SENDER Ruth A. Taylor

SENDERS ADDRESS 1314 John St 21217

DO NOT PAY OVER $100.00

DOLLARS	CENTS

PAY THE SUM OF _____ DOLLARS

7/23/00 Ruth A. Taylor _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Taylor 2
11/23/80
J. Lee

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for La Raza

SENDER Ann A. Taylor

SENDERS ADDRESS 1304 John St 21217

DO NOT PAY OVER $100.00

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

11-23-80 Ann A Taylor _____
DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Taylor 2
11-23-80
J. Ty.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for La Raza

SENDER Ann D Taylor

SENDERS ADDRESS 1304 John St 21217

DO NOT PAY OVER $100.00

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

1-13-81 Ann D Taylor _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

Taylor 3
1/23/80
$10.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for La Londe

SENDER Glenn A. Taylor

SENDERS ADDRESS 1304 Lake St Bell, Ind

DO NOT PAY OVER $100.00

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

_____ DATE _____ AUTHORIZED SIGNATURE _____ NO.

Writer's Initials _____ Date _____

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

_____

ADDRESS _____ TELEPHONE NUMBER _____

Writer's Initials _____ Date _____

Writer's Initials _____ Date _____

ENDORSEMENT AND ADDRESS

To the
1/23/80
S.S.

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for La Ronde

SENDER Anna R. Taylor

SENDERS ADDRESS 1304 John St. 21217

PAY THE SUM OF

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

1/23/80 Anna R. Taylor

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

STATEMENT

A statement regarding the voluntary nature of handwriting exemplars and the fact that no threats or promises were used to obtain same can be obtained on this sheet. Such statement should be in the handwriting of the individual furnishing exemplars.

I have voluntarily given samples of my hand writing to the Federal Election Commission - Such samples were obtained without any threats or promises -

Ann A. Taylor — Signature of person giving samples

7-23-80 — Date

Taylor S — Witness

Date

7/23/80 — Witness

Date

MISCELLANEOUS WRITING

Writer's Initials _____ Date _____

ATTACHMENT #5
page 3

CITIZENS FOR BARNACLE
P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

3

Name of contributor Anne G Taylor
Address 1304 Light St
City Balt State Md Zip
Amt. of contribution 150—
Contributor's occupation retired
Place of employment
Address
CFL Representative DHF/BTH

Taylor 6/23/80

AMERICAN EXPRESS MONEY ORDER 33-1/1020

1126 55-466,938,411

PAY THE SUM OF
NOT OVER $300

DATE 6/23 19 80 ONE HUNDRED FIFTY DOLLARS 00 CTS

TO THE ORDER OF Citizens for Barnacle

CHAIRMAN

Anne G Taylor 1304 Light St Balt Md
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000①155 ⑈466938411⑈

25

10197
81 JUL 20 AM : 20

IN RE:

M.U.R. 1158
FEDERAL ELECTIONS COMMISSION

- - - - - -

The deposition of WILLIAM J. HAYDEN was taken on Thursday, July 9, 1981, commencing at 12:05 p.m., at The United States Court House, 101 West Lombard Street, Baltimore, Maryland 21201, before Anthony Rolland, a Notary Public.

- - - - - -

APPEARANCES:

Robert Bogin, Esquire and
Daniel Blessington, Esquire,
On behalf of the Federal Elections Commission

Reported by:

Anthony Rolland

GORE BROTHERS REPORTING CO.
[illegible] E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
[illegible]

I N D E X

WITNESS:	PAGE
William J. Hayden	
Examination By Mr. Bogin	3

EXHIBITS

Commission Exhibit No. 1	4

STIPULATION

It is hereby stipulated and agreed that the reading and signing of the within deposition by the witness be and the same is hereby waived.

- - - - - -

WILLIAM J. HAYDEN,

called for examination, being first duly sworn according to law, testified as follows:

EXAMINATION BY MR. BOGIN:

Q Sir, could you give us your name for the record.

A William J. Hayden. Reverend Hayden it is.

Q And would you spell your last name, please?

A H-a-y-d-e-n.

Q And your present address, sir?

A 2600 Round Road, Apartment B-3, 21225.

Q And how long have you been living at the present residence?

A It will be eighteen years the 11th of December, moved there on December 11th, 1963.

Q And your present occupation?

A I am Pastor and do voluntary service at Rosewood

with the Foster Grandparent Program.

Q How long have you been a pastor?

A I have been a pastor about twenty-six years.

Q Have you ever heard of an individual by the name of Lyndon LaRouche?

A Only through the stipulations -- I think running for office. I was trying to -- only time I heard of him.

Q Did you ever make a contribution to Citizens for LaRouche?

A No, I did not.

Q I'd like to show you a money order which I am going to have marked by the court reporter as Commission Exhibit No. 1. It's an American Express Money Order.

(Whereupon, Commission Exhibit No. 1 was marked for identification.)

Q Reverend Hayden, I have here Commission Exhibit No. 1 which is an American Express Money Order, the last three digits of the serial number are 478. It's a money order in the amount of $35 payable to Citizens for LaRouche with your name printed on it and a signature underneath it.

A That's not my signature.

Q So the signature under the name William Hayden is not your signature, you don't recognize the handwriting?

A It is not my signature.

Q Have you ever seen this money order before today?

A Never before. And the $35 I gave him for membership in the Drug Coalition Conference that he said in September of 1980 we are working to have it here in Baltimore, and as a member of that conference, annually I paid my $35 and that's all I paid.

Q So you have never seen this money order before?

A Never seen it and that's not my signature.

Q Now, it's made out for $35.

A Okay.

Q And you mentioned just now that at some point in time in September of 1980 you gave somebody $35.

A I gave this right here.

Q Who is that person, Robert Primack?

A That's right.

Q And what were the conditions under which you gave

Robert Primack $35?

A Member of the Drug Coalition Conference that was supposed to have been put in annually each year in succession to the one that was held in Detroit, September, '79.

Q When did you first meet Robert Primack?

A About maybe 30 days before that at a Drug Coalition meeting we had down at the Hilton Hotel.

Q And how did you first hear about the Drug Coalition?

A Through him.

Q You ran into it through Mr. Primack?

A Yes, sir.

Q Did you run into him in the street or did he call you on the phone or how did you first meet him?

A I believe I met him through another friend that he had been talking with and working with.

Q Do you remember the name of that friend?

A And he asked me would I be at that meeting that Sunday evening and being interested in the young people and the welfare, if there is anything that I could

help do, I started in with that.

Q So, you met Mr. Primack through a friend of yours?

A That's right.

Q And upon being introduced to him he asked you whether or not you would like to attend a meeting?

A That's right.

Q And this meeting was about the drugs?

A That's right.

Q And where was that meeting held?

A At the Hilton.

Q And at that time was there any money involved in this meeting?

A Not at that time. Plenty of literature down there on the table to sell. I didn't give any money at that time. Only money I gave is that $35 which I give him which I was unable to find the receipt to bring it. And all it was concerning the Drug Coalition Program.

Q Reverend Hayden, that meeting at the Hilton was the name Lyndon LaRouche ever brought up?

A I could not truthfully say to my memory. I could

not say, it might have been.

Q And was there any registration fee associated with that Hilton Hotel meeting?

A Not that I can recall.

Q Was there any passing of the hat or any money requested by the participants?

A No.

Q So after that Hilton meeting did Mr. Primack ever call you again?

A Oh, yes, because I was looking for him to make this trip to Detroit and it all was leading to that Drug Coalition.

Q And do you know who runs the Drug Coalition? Who is it affiliated with?

A Well, it's affilitated with a group of them but most of mine was working through him. To get at the bottom of it as to whoever it was, I am afraid I am unable. But I attended that conference in Detroit. We did have a very rich rewarding conference because we had come from Manila and other different places overseas and making up the conference of the program of it. They did not have

any special agenda set up because that was the first time, but they would be working for the next following year which would be September, '80 to have a better conference.

Q And what was the purpose of the conference?

A To wipe out the drugs of the section and try to keep it from coming in and all things like that.

Q And were you ever given a book or purchase a book called Durp, Incorporated?

A No, I didn't purchase the book.

Q Did anybody ever give it to you?

A No, I don't have it.

Q Have you ever read it?

A No, I haven't.

Q And at this Drug Coalition meeting in Detroit, did you pay somebody $35 to attend that meeting?

A I didn't pay that money until after I came back.

Q And what was the purpose of that $35?

A Annual membership in the Drug Coalition Conference.

Q And did you receive anything for this membership?

Do you get a card saying you were a member? Did you get any kind of literature?

A Haven't seen or heard from him since, nothing.

Q So you gave Robert Primack $35 --

A Most certainly did.

Q -- for payment in a membership in a Drug Coalition foundation?

A That's right.

Q And you haven't received --

A Haven't seen or heard from him from that day to this.

Q So ever since you have paid him that $35 you have not spoken to Robert Primack since then?

A Seen or heard from him.

Q Have you spoken to anybody that worked for Lyndon LaRouche?

A No.

Q So when I showed you Commission Exhibit 1 which is a money order for $35, it came as a complete surprise to you?

A It is.

Q And that signature on that money order is not your signature?

A Is not my signature. It's my name but not my signature.

Q And you don't recall ever making a contribution to Citizens for LaRouche or to Lyndon LaRouche?

A Under no circumstances. That must have been when he put it instead of with the Drug Coalition.

Q And Robert Primack never indicated to you that your payment of $35 was going to be for Citizens for LaRouche?

A No, because it was for the membership.

Q In the Drug Coalition?

A Drug Coalition.

Q Could you tell us again the dates that the Detroit meeting was held?

A I don't have that with me but it was in September of '79.

Q On the money order here for $35, Commission Exhibit 1, the money order was said to be purchased January 8th, 1980. Do you recall if that was around the

time you gave Robert Primack the $35?

A It was.

MR. BOGIN: I have no further questions.

(Deposition concluded.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Anthony Rolland, a Notary Public in and for the State of Maryland, County of Howard, do hereby certify that the within named, WILLIAM J. HAYDEN, personally appeared before me at the time and place herein set out and after having been first duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulations contained herein were agreed to by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related

to any of the parties, nor in any way interested in the outcome of this action.

As Witness, my hand and Notarial Seal, this 29th day of July, 1981, at Baltimore, Maryland.

NOTARY PUBLIC

Exhibit J

1-15-80

DATE _____ DEPOSIT CODE _____

(2)

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-457,316,478

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Jan 8 19 80 THE SUM OF 3 DOLLARS 00 CTS

TO THE ORDER OF Citizens For LaRouche

CHAIRMAN

William Hayden 2600 Round Rd Apt B-3 Balt Md.
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

William J Hayden

⑈1020⑈ ⑆000155⑆ 457316478⑈

00003

MD

⊗

NEI
A.F.
1/9/81

RECEIVED
81 JUL 28 AM : 20

IN RE: *
*
M.U.R. 1158 *
FEDERAL ELECTION COMMISSION *
*
* * * *

Statement of Counsel with regard to the scheduled depositions of BELINDA deGRAZIA, VIVIEN RANEY, STEVEN WARM and FLORA HURLEY was taken on Wednesday, July 22, 1981 commencing at 12:20 p.m. at the United States Court House, Room 820, 101 West Lombard Street, Baltimore, Maryland, 21202, before Anthony Rolland, a Notary Public.

APPEARANCES:

Robert Bogin, Esquire
On behalf of the Federal Election Commission

David B. Mitchell, Esquire
On behalf of the scheduled witnesses

Reported by:
Anthony Rolland

CORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837 - 3027

MR. MITCHELL: The statement for the record, there were several people who were called to appear by subpoenas issued by the Federal Election Commission for depositions that were scheduled for last week or a week and a half ago. Those depositions have been rescheduled for today's date at my request because I had just been retained and entered the case. Mr. Bogin was kind enough to consent to that delay.

Since that time there have been a number of developments and a number of discussions that Mr. Bogin and I have had concerning the taking of these depositions.

It should be noted that Dr. Robinson's appearance this morning was despite the suit filed in the United States District Court for the Southern District of New York at Foley Square in New York City. Dr. Robinson has an extremely busy schedule and he did not want to have this matter delayed, and he just wanted to get the inconvenience of it out of his way, so he appeared this afternoon.

The other individuals do not wish to appear in light of the suit that was filed in New York and the

Show Cause Order that was involved. I think for the record we ought to have the names of those people put forward. That would be Ms. Belinda F. deGrazia, Ms. Vivien Raney, Steven G. Warm and Flora Hurley.

The suit that I refer to is titled Patricia Dolbeare, treasurer of Citizens for LaRouche, et al., Plaintiffs, versus the Federal Election Commission, and it's under Civil Action No. 81 CIV 4468. It's a petition for preliminary injunction and there's a hearing set up for the determination of that before a Judge Breant of the United States District Court in New York City for August 20, 1981.

Those individuals have therefore declined to appear at these proceedings because they feel that this is an imposition to them and they feel that this suit is determinative of the issue and they're awaiting the outcome of the litigation there to determine whether they will appear or whether they will continue to contest the investigation by the Federal Election Commission.

On Monday, July 20th, I spoke with Mr. Bogin by telephone and advised him that there was a suit pending

as I understood it and that there was a possibility that these individuals may elect not to appear on today's date for their depositions. We discussed the issues and agreed to discuss them again the following day on Tuesday, the 21st of July. We did so and Mr. Bogin at that time advised me that the Commission had denied the motion to quash the subpoenas that had been individually sent in by the deponents before they retained my services. Therefore, it was the right for the issue of determination whether they will appear or whether a course of action will be taken against them.

Dr. Robinson elected to appear, the other four individuals elected not to appear, and this was advised to Mr. Bogin who agreed to proceed today only with Dr. Robinson. He didn't waive any rights as I understand it to seek enforcement acts against these individuals for not appearing, but he understood the reasons why they were not appearing.

It's my understanding that at the time of our conversation on the 21st he had not even been served, on behalf of the Federal Election Commission, a copy of any

of the pleadings in New York City. I don't know if that continues today. I have copies of things that were Federal Express to me for my files and my records and I would be happy to let you make copies of these documents if you need them.

That is the reason why there are not further depositions being taken today. We would therefore wait for the decision of the Commission as to where we proceed from here.

MR. BOGIN: Just for the record I'd like to say that we got a copy of the complaint Monday. I didn't receive my copy until very late Monday after we talked. Mr. Mitchell and I agreed at that time that the Commission would not go after cost in any type of subpoena enforcement action as long as he advised me before today's date that Ms. Hurley, deGrazia, Raney and Mr. Warm would not be present for today's deposition. The Commission does not waive their right to bring subpoena enforcement action should they decide to do so.

(Proceedings concluded.)

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Anthony Rolland, a Notary Public in and for the State of Maryland, County of Howard, do hereby certify that the foregoing transcript is a true and accurate copy of the proceedings indicated.

Notary Public

81 JUL 23 AM : 20

IN RE: :

M.U.R. 1158 :
FEDERAL ELECTIONS COMMISSION :

- - - - - -

Statement of counsel with regard to the scheduled deposition of JOHN HALLMAN was taken on Thursday, July 9, 1981, at 2:45 p.m., at the United States Court House, 101 West Lombard Street, Baltimore, Maryland 21201, before Anthony Rolland, a Notary Public.

- - - - - -

APPEARANCES:

Robert Bogin, Esquire and
Daniel Blessington, Esquire,
On behalf of the Federal Elections Commission

Reported by:

Anthony Rolland

GORE BROTHERS REPORTING CO.
201 E. BALTIMORE ST.
BALTIMORE, MARYLAND 21202
837-3027

MR. BOGIN: In a letter dated July 19th, 1981, the General Counsel notified John Hallman to be subpoenaed for a deposition to take place on July 9, 1981, at 2:15 p.m. in the United States Court House, Room 820.

Mr. Hallman subsequent to receiving this letter called Robert Bogin of the Office of General Counsel and confirmed his appearance for the taking of his deposition.

It is now 2:45 p.m., July 9, 1981 and Mr. Hallman has failed to appear for his subpoena. He has not attempted to call either the office in Washington, D.C. or the U. S. Attorney's office in Baltimore, Maryland in an attempt to explain why he has not appeared.

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Anthony Rolland, a Notary Public in and for the State of Maryland do hereby certify that the within is a true and accurate recording of the proceedings indicated.

NOTARY PUBLIC

LAWYER'S NOTES

Page	Line	

BEFORE THE FEDERAL EXCHANGE COMMISSION

IN RE: *

MUR 1158 *

* * * * * * *

UNITED STATES COURT HOUSE

BALTIMORE, MARYLAND

JULY 30, 1980

APPEARANCES:

ROBERT BOGIN, ESQUIRE
HAL PONDER, ESQUIRE
MICHAEL DYMERSKY, ESQUIRE
On behalf of the Federal Exchange Commission

PETER PARKER, ESQUIRE
On behalf of Debra Hanania Freeman

Reported by:

Susan D. Ashe, RPR

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837 - 3027

I N D E X

WITNESS:	PAGE:
Debra Hanania Freeman	3

E X H I B I T S

NUMBER:		
1	Check Sample	7
2	Check Sample	8
3	Check Sample	9
4	Contributor-Confirmation Form	10
5	Money Order Sample	13
6	Money Order Sample	14
7	Money Order Sample	15
8	Money Order Sample	15
9	Money Order Sample	15
10	Money Order Sample	16
11	Endorsement and Address Sample II	18
12	Check Photocopy	70
13	Check Photocopy	70
14	Travelers Express Money Order Photocopy	72
15	Federal Express Money Order Photocopy	75
16	Contributor-Confirmation Form	85
17	Contributor-Confirmation Form	85
18	Household Finance Bill Photocopy	86
19	Endorsement of Check Photocopy	87
20	Contributor-Confirmation Form	89
21	American Express Money Order Photocopy	91
22	American Express Money Order Photocopy	92
23	Contributor-Confirmation Form	95
24	American Express Money Order Photocopy	96
25	American Express Money Order Photocopy	97
26	Travelers Express Money Order Photocopy	97
27	Contributor-Confirmation Form	99
28	Contributor-Confirmation Form	104
29	American Express Money Order Photocopy	105
30	Contributor Form and Federal Express Money Order	106
31	Money Order Photocopy	107
32 and 33	Federal Express Money Order Photocopies	107

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

STIPULATIONS

It is stipulated and and agreed by and between counsel for the respective parties that the filing of this deposition is hereby waived.

- - - - - - - - - - - - - - -

DEBRA HANANIA FREEMAN,

called for examination, having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION BY MR. BOGIN:

Q Would you please give us your name for the record?

A Debra Hanania Freeman.

Q Are you sometimes known as Debra Hanania?

A Yes.

Q Or Debra Freeman?

A Yes.

Q And Debra Hanania Freeman?

A Right.

Q Is Freeman your married name?

A Yes, it is.

Q Where doyou live?

A 4004 Linkwood Road in Baltimore.

Q How long have you lived at that address?

A Oh, I think about three years.

PENGAD CO. BAYONNE, N.J. 07002 · FORM 740

Q And what is your occupation?

A I'm a teacher.

Q Where do you teach?

A It's Stanley Caplan Education Center.

Q Is Stanley Caplan where they teach for law board and --

A Right.

Q -- med boards?

A Right.

Q All right. How long have you been working for Stanley Caplan?

A About two years.

Q How many hours a week do you work?

A It varies, depending on the season.

Q In 1979 how many hours would you say you worked, remember?

A Oh,'79, I think I taught eight courses and each course is about eight classes, and each class is about four hours long. You can multiply it out yourself. I really don't know how many hours I worked.

Q And do you get paid by the hour?

A Yes.

Q Do you know whatyou get paid by the hour?

A Yes, I do.

Q What is that amount?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Do I have to answer you in terms of my own personal income? I don't really see how it's relevant to this.

MR. PARKER: I'm not sure about the relevance either, to tell you the truth. Is there some reason for asking her?

MR. BOGIN: I'm interested in knowing the income, get an income profile.

MR. PARKER: I think it's a reasonable question in light of the fact that they're apparently attempting to determine how much money is being contributed here.

THE WITNESS: Okay, I make about $15 an hour and then I'm paid $5 to $10 depending on the course, per hour for preparation for each class.

Q Oh, I see. Can you give me an approximate amount that you made from Stanley Caplan in 1979?

A 1979 -- I really don't know exactly. I'd have to check my records. I'd have to check my tax records but I can furnish you the information.

Q All right. Doyou have any other source of income besides teaching at Stanley Caplan?

A Yes. I do consulting work on occasion and I do some free-lance writing.

Q Could you approximate how much money you grossed last year in terms of income?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Total.

Q Total, 1979.

A I would say probably somewhere between -- somewhere in the area of ten to fifteen thousand.

Q And what is your husband's name?

A Lawrence Freeman.

Q And is he employed?

A He -- well, he does consulting work. He's self-employed really.

Q And approximately to the best of your knowledge, how much money did he gross last year in 1979?

A I have absolutely no idea.

Q Do you file income tax returns?

A Um-hum.

Q Do you file a joint return?

A Yes.

Q Have you filed your return for 1979?

A I don't know. I think we may have filed an extension.

Q Okay. At this time I am going to ask you to give us samples of your handwriting.

A Okay.

Q I have various forms here. I'm going to hand you a form and dictate what I'd like you to write and then mark it as an exhibit.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Okay.

Q I'll start off with a check sample. It's a copy of a blank check. It has sample written across it.

MR. PONDER: Excuse me, just a minute. I think you want a tag under it.

MR. PARKER: Here, she can write on the back of that.

Q And I'd like you to write that check out as if you were writing it to Citizens for LaRouce in the sum of $400 and sign it.

A Do you want all this stuff filled out?

Q Yes, put the date of August 6, '77.

A Okay. Telephone number and stuff like that?

Q Please.

MR. BOGIN: I'm going to give this to the Court Reporter. Mark it Freeman Exhibit 1, and Exhibit 1 will be that sample that you just filled out of this sample check.

MR. PARKER: Will you furnish us a copy of that?

MR. BOGIN: I'll furnish you a copy at the time we get the deposition back.

MR. PONDER: These will be attached to the deposition, so you will get copies.

(Whereupon, Freeman Deposition Exhibit No. 1 was marked for identification.)

Q I have another check sample, the same as the

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

one you just filled out. I'd like you to fill it out again to Citizens for LaRouche.

MR. PARKER: Which is this one, same one?

Q This is the same form and at this time I'd like you to fill it out for a different amount. Fill it out for $15 and date it November 21st, '79.

A I'm sorry, what did you say?

Q The date would be November 21st, '79.

A Okay. Sign the same way?

Q Yes. How do you normally sign your checks?

A Well, it depends. I have recently changed my account to Debra Hanania Freeman. I previously wasn't using my married name.

MR.BOGIN: Okay. I'd like to have this latest check sample marked Deposition Exhibit 2 which would be the handwriting sample, paid to the Order of Citizens for LaRouche for $15.

(Whereupon, Exhibit No. 2 was marked for identification.)

MR. PARKER: You have quite a stack here. She's not going to give innumerable handwriting samples, I can tell you.

MR. BOGIN: There will be quite a few --

MR. PARKER: Well, you're not entitled to quite a few. I mean, you know, she might do one more here but

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

that's going to be the end of that. Otherwise you'll have to get a court order.

MR. PONDER: I think we better go off the record a minute.

(There was a discussion held off the record.)

BY MR. BOGIN:

Q I have handed you a check sample, another one marked, check sample, and I'd like you to fill it out this time but instead of signing your name Debra Hanania Freeman would you please sign it Debra J. Hanania and it could be out to Citizens for LaRouche and this time make it out for $45.

(There was a discussion off the record.)

MR. BOGIN: Thank you. I have here a check sample, pay to the order of Citizens for LaRouche for $45 signed by Debra J. Hanania and I'd like to have this marked Commission Exhibit No. 3.

(Whereupon, Commission Exhibit No. 3 was marked.)

MR. BOGIN: I have a correction for the record. On the first exhibit I have it marked down Freeman Exhibit No. 1. I'd like that changed to Commission Exhibit No. 1.

(Whereupon, Freeman deposition Exhibit No. 1 was changed to Commission Exhibit No. 1.)

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q I have in my hand a different sample form. It's basically a contributor-confirmation form and I'd like to give this to you and dictate certain information I'd like you to write on the form. Where it says date, it would be January 23rd, 1980.

(There was a discussion held off the record.)

A September 23, 1980.

Q "I contributed $220 on January 15th, 1980," and I'd like you to sign that Harold H. Harrison, M.D. 3900 North Charles Street, Baltimore, Maryland.

That's fine. Thank you.

MR. BOGIN: I'd like to mark this Commission Exhibit No. 4.

(Whereupon, Commission Exhibit No. 4 was marked for identification)

Q Do you know a Dr. Harrison?

A Not personally.

MR. PARKER: What did you say?

THE WITNESS: Not personally.

(There was a discussion held off the record.)

MR. BOGIN: Back on the record, counsel has objected before about the exhaustive nature of the handwriting samples. I'd like to put on the record that in order to have these handwriting samples properly analyzed we are going to need to have five identical copies of

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

each item that has to be analyzed.

To do that we have about eight to ten items which, times five, is going to be 40 to 50 samples that we are going to have.

I understand that it is tedious and we recognize this, but it it necessary.

MR. PARKER: Well, let me ask you this. Let's do the eight to ten. You can make photocopies.

MR. BOGIN: No. For purposes of analysis we cannot make photocopies. We need originals.

MR. PARKER: I'm not saying we won't do it, but let's take the deposition. Do your eight to ten items, at least, in the singular form and then we'll argue about it after the deposition is over. Maybe we'll do it. See what happens.

MR. BOGIN: I'm not sure I understand you. We are going to proceed with the handwriting samples and let's get them over with.

MR. PARKER: You've got eight to ten, is that what you're telling me, and then you need five copies of each? I mean, is that what you're saying?

MR. BOGIN: Five originals --

MR. PARKER: Okay, well, we've already done four. Let's get the four or five or six, or whatever you've got.

MR. PONDER: I'd like to accommodate the

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

procedure you're suggesting, but we can't do it that way. We need to take five samples of the particular one at the time that -- I mean, you're suggesting a procedure to us. We have to determine what procedure we want to go by.

MR. PARKER: I know, but what I'm saying is so far we've only made one copy each of these things. You now want to make four additional copies.

MR. PONDER: Um-hum.

MR. PARKER: Well, I'm saying that if Mrs. Freeman is going to do that, she's going to do it at the end of this deposition when I'm not sitting here getting paid $100 an hour, I mean, because that's going to take a while to fill out 40 forms. Maybe she'll be glad to do it, fine. You're not losing anything by that.

But what you're saying is that she -- you take this and you take four additional pages and fill it out the same way, right, is that what you're saying?

MR. BOGIN: I think we'll do a couple more, a few more of these and then we'll get on to the questioning and then if you'd like to leave and Ms. Hanania would like to stay and fill out more of the same we can understand that.

MR. PARKER: Really, I mean I'm being very reasonable here because I honestly don't think you're entitled to all these things, you know. I mean I seriously

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

doubt if you're entitled to any handwriting samples. Maybe you are, but you know, we just want to get the deposition over.

Q Okay. I have here a sample money order that is written sample across it and there's a broad black line. I'd like you to fill out the bottom half of that money order and it's paid to the order of Citizens for LaRouche and where it says sender, I'd like you to put the signature Ann R. Taylor and the address, 1304 John Street --

A John?

Q John -- Baltimore, Maryland and then where it says authorized signature I'd like you to put Ms. Ann R. Taylor's signature again down there and date it.

A What date do you want?

Q Today's date would be fine.

A The 30th?

Q July 30th.

MR. BOGIN: I'd like this marked Commission Exhibit No. 5. It's the money order sample filled out by Mrs. Freeman that is payable to Citizens for LaRouche and it's marked Ann R. Taylor.

(Whereupon, Commission Exhibit 5 was marked for identification)

Q I have another money-order sample that I would like you to fill out payable to Citizens for LaRouche.

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

A Bottom half again?

Q Bottom half, please.

The sender this time would be Nancy Radcliffe, 3215 North Charles Street, Baltimore, but B-a-l-t-o, 21215 and date it January 12, 1979 and sign Nancy Radcliffe's name on the bottom.

A January 12th, '79?

Q Right.

MR. BOGIN: I'd like to mark money order payable to Citizens for LaRouche, sender Nancy Radcliffe, as Commission Exhibit No. 6.

(Whereupon, Commission Exhibit 6 was marked for identification.)

Q I have another sample money order that has to be filled down at the bottom, payable to Citizens for LaRouche, the sender is Kevin Salisbury, 1909 North Forest Park Avenue.

A 1909?

Q North Forest Park.

A Avenue?

Q Avenue. Baltimore, B-a-l-t-o, Maryland, M-d, and the date would be January 12th, 1979, signed by Kevin Salisbury.

Thank you. I have another money order sample --

MR. PARKER: Mine's dated 1980.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q All right, excuse me. I'm going to mark this last money order sample Citizens for LaRouche, sender Kevin Salisbury as Commission Exhibit No. 7.

(Whereupon, Commission Exhibit No. 7 was marked for identification.)

Q I have another money order sample. This time it should be paid to Citizens for LaRouche. Sender would be David Sanders, and just sign it David Sanders on the bottom with today's date, please.

MR. BOGIN: I have money-order sample payable to Citizens for LaRouche, sender David Sanders, which should be marked Commission Exhibit No. 8.

(Whereupon, Commission Exhibit No. 8 was marked for identification.)

Q This is the last one of this series. This would be payable once again to Citizens for LaRouche, sender Charles Clark, 14 North Hilton Street, Baltimore, Maryland, and sign it Charles Clark's name.

MR. BOGIN: I have money order samples, handwriting samples, from Mrs. Freeman paid to the order of Citizens for LaRouche, sender Charles Clark. Mark it Commissioner Exhibit No. 9.

(Whereupon, Commission Exhibit No. 9 was marked for identification.)

Q I remembered one more actually. This is the last

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

one for this series. It will be Citizens for LaRouche. Ernest Pulsifer.

MR. PARKER: Earnst?

MR. PONDER: Ernest.

Q Ernest; and while I look up the address will you sign it Ernest Pulsifer.

MR. PARKER: How about 209 Second Avenue.

Q Okay.

A Is that what you want me to write.

Q Hold on just a second.

MR. PARKER: The money order itself does not have an address on it.

Q Okay. Well, let's leave it without an address then.

A In Baltimore.

Q Yes, put Baltimore, Maryland.

MR. BOGIN: Okay. I have money order sample, handwriting sample, Citizens for LaRouche, sender Ernest Pulsifer; and that would be Commission Exhibit No. 10.

(Whereupon, Commission Exhibit 10 was marked for identification.)

MR. BOGIN: At this stage I am going to postpone the rest of the money order samples. We'll go through the deposition and then if Mr. Parker cares to leave at that time, Mrs. Freeman can fill out the rest of the handwriting

PENCAD CO. BAYONNE, N.J. 07002 - FORM 240

samples.

There's one more sample, though, before I do that. It's a different type.

Q I'm going to give you a blank endorsement and address form and I'm going to giveyou a series of signatures, dictate a series of names which I'd like you to put down their signatures.

MR. BOGIN: Off the record, please.

(There was a discussion held off the record.)

Q In order to expedite this for everybody's case, I have given you an endorsement and address blank and I'd like you to write the following signatures down: Mary Cavanaugh, and then space it a little bit and underneath that one put Steven Warm, Belinda F. deGrazia, Robert A. Robinson --

MR. PARKER: Robert A?

MR. BOGIN: That's correct.

Q Edward St. John, Rustom Ghandi --

A What?

Q Rustom Ghandi, R-u-s-t-o-m, G-h-a-n-d-i, Arthur Murphy, Constantine Philiso, P-h-i-l-i-s-o.

A P-h-i-l--

Q -i-s-o.

MR. PONDER: i-l-s, isn't it?

MR. BOGIN: I have it this way.

FENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PONDER: No, that's not right. It's i-o-s.

Q Okay. Then, underneath that then write it i-o-s. Sign it as --

A P-h-i-l-i-o-s?

Q P-h-i-l-i-o-s. Thank you.

MR. PARKER: Let's take a look at it.

MR. BOGIN: I was going to mark it as an exhibit. I have here an endorsement and address that contains one, two, three, four, five, six, seven, eight signatures of various individuals that have been filled out as a handwriting sample and I'd like to mark it Commission Exhibit No. 11.

(Whereupon, Commission Exhibit No. 11 was marked for identification.)

MR. BOGIN: Okay. Now, at this time we are done with the first stage of the handwriting samples and we'll get on with the deposition if there's no objection.

MR. PARKER: Fine.

BY MR. BOGIN:

Q Have you ever run for elected office?

A Yes.

Q When was that?

A 1978.

Q And what office were you seeking?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A House of Representatives.

Q And what party were you affiliated with?

A I was an independent.

Q An independent? Are you familiar with the individual named Linden LaRouche?

A Yes.

Q How are you familiar with him?

A I'm not sure I understand what you are asking me. You mean -- do you want me to identify how do I know him?

Q That's right.

A Okay. He's the Democrat running for President.

Q Have you ever met the man?

A Yes.

Q When was the first time you met him?

A Ten years ago.

Q Do you recall the occasion?

A I think he was probably teaching a class that I attended.

Q Where would the class have been?

A I can't remember whether it was Columbia University or the State University of New York, at Stoney Park.

Q Were you a student of his?

A Yes.

Q How many times would you say that you have met

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

him personally?

A Hundreds of times.

Q Hundreds of times? Are you a campaign worker for his try for the Presidency?

A I'm a volunteer.

Q You're a volunteer?

A (Witness indicates yes.)

Q Do you volunteer mostly in the Baltimore, Maryland area?

A Yes.

Q Would you consider yourself the head of the Baltimore area volunteers?

A I might but no one else does.

Q Does Mr. LaRouche have campaign headquarters down in Baltimore?

A No, he doesn't.

Q Who else works for Mr. LaRouche as a volunteer that you are familiar with in this area?

A My husband.

Q Is that Lawrence Freeman?

A Yes. I don't know. Do you want me to just name who does fvolunteer work for him?

Q Yes, that you know.

A John Asher, Rochelle Asher, Nancy Radcliffe, Gerald Belski, Belinda deGrazia -- I mean there are an awful

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

lot of people who do volunteer work for him. I couldn't possibly name all of them.

Q Is there anybody who's paid to do that work for Linden LaRouche in --

A In Baltimore?

Q -- in the Baltimore area?

A Not that I know of.

Q Are you familiar with a group called Citizens for LaRouche?

A Yes.

Q Do you know anybody who works for Citizens for LaRouche?

A Do you mean paid?

Q Paid.

A Not that I know of.

Q Do you know people who volunteer for Citizens for LaRouche?

A Yes.

Q What is Citizens for LaRouche?

A I think it's the principal campaigning company of Linden LaRouche.

Q What are your responsibilities as a volunteer? What do you do as a volunteer?

A It varies. I do some office work, you know, fund-raising-type activity like selling tickets for a fund-

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

raiser, mailings, whatever has to be done.

Q You say you do office work, do you work out of an office?

A No. We do things in various people's homes.

Q Is there one central location where most of the volunteers get together to do work?

A Not really.

Q Are there meetings of volunteers for LaRouche?

A Well, there are fund-raiser type things and video tape showings and stuff like that and that's volunteers, but also, you know, people who aren't volunteers like to make volunteers.

Q Okay. Let's talk about a typical fund-raiser. Okay. Who makes the suggestion to have a fund-raiser?

A New York; New York Headquarters.

Q New York Headquarters; could you identify a person in New York --

A Sure.

Q -- who gives the idea for a fund-raiser?

A Felice Gelman.

Q And who is Felice Gelman?

A I think she's Linden's Treasurer.

Q Treasurer of Citizens for LaRouche?

A Yes.

Q And she'll get on the telephone?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q And call you?

A She calls my husband. She calls me. She'll call any number of people. She might call someone in Washington.

Q Do you and your husband live at the same address?

A Sure.

Q So they can telephone your house and talk to either you or to your husband?

A Yes.

Q Yes; and then could you give me a typical dialogue that you might have with Ms. Gelman for a fund-raiser?

A Yes. Felice will say, "We need money. Let's have a fund-raiser," and we will say, "Okay. When do you want to have it? How much do you want to spend? How much should we charge for tickets?"

She will then send us printed material, tickets. We usually reserve a hotel. They send us a check to pay for the hotel.

Q They being Citizens for LaRouche?

A Right; and that's about it and we proceed to try to sell tickets.

Q How do you sell tickets?

A I'm not sure I understand.

Q Do you stand on a street-corner or do you --

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A No, no.

Q What's the process whereby you sell tickets to these fund-raisers?

A Well, generally we call people we think might be interested in purchasing tickets. Some of them are personal friends, people we work with. Sometimes their names have been suggested to us by other people. That's pretty much how we do it.

Q Is that through telephone or --

A Yes, through telephone, word of mouth.

Q Through mailings?

A Sometimes, yes.

Q Can you remember the most recent fund-raiser that you participated in?

A Let me think, we had a whole bunch of them right around New Hampshire primary. I'm trying -- I think we had one in March; but to tell you the truth, I really can't remember.

Q Well, let's talk about the one February or March.

A Sure.

Q Now, what would be the typical price for a ticket?

A $100. That's for a single ticket.

Q For a single ticket?

PENGAD CO. BAYONNE, N.J. 07002 - FORM 760

A Witness indicates yes.

Q And in those ones in February, March, what would be about the average number of tickets sold?

A Let's see. We had a big one on December 9th in Washington.

Q December 9th?

A That was between -- that was a joint between us and Washington. We must have sold, oh, I would say about 4500 tickets for that.

Q And did you, yourself, personally sell any tickets?

A Oh, sure.

Q And you would find somebody who was interested in a ticket and they would give you money for the ticket?

A Money, checks; sometimes we'd give people tickets and, you know, they would give us money later. Sometimes they would come in the mail.

Q And did you oftentimes receive cash for these tickets?

A On occasion.

Q And checks?

A Yes.

Q And money orders?

A Yes.

Q Any other form of payment?

A No.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q And usually it would be for $100, that would be the --

A Well, not always. Sometimes if someone were to buy a number of tickets we would give it to him at a lower rate. Sometimes we would sell a group ticket for $250. It really, you know, it really depended on the circumstances.

Q And when you collected the money where did it go from there? After you received it, could you tell me what happens to that money?

A Yes; we mail it to New York.

Q To Felice Gelman?

A Well, we mailed it to Citizens for LaRouche to Felice's attention.

Q To the committee?

A (Witness indicates yes.)

Q So sometimes you have quite a bit of cash. Do you put that in the envelope, too?

A No. We buy money orders for it.

Q You buy money orders with the --

A Well, sure, because you can't send cash.

Q No. I understand that. So, what you do is when you receive cash you go buy money orders with that?

A Well, it depends. If I get -- let's say I sell someone a ticket and they give me a hundred dollars.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

I will ask that person if it's okay if we get a money order in their name and I'll ask them to sign a statement. If they sign a statement, I'll buy a money order. That's one thing.

And there's another kind of money order you buy as well which is at a fund-raiser itself or a video showing. Sometimes you pass the hat around and everybody will make a contribution. We don't know who -- these are small contributions and we buy one big money order for that whole thing. Generally everything that goes to New York is either check or money order.

Q Okay. You mentioned you had them sign a statement.

A Yes.

Q What kind of statement?

A The kind that I just filled out for you actually. This thing here.

Q Saying that they made a contribution?

A Either they fill it out there, you know, or we try to get them to fill it out right on the spot or what will happen is sometimes we don't get them to fill it out right on the spot and we'll mail it to them and if it's returned or sometimes New York handles it. You know, they just do it directly.

Q Okay. Do you ever deposit any of the money or checks at a local bank account?

A No, I don't have an account.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q So you send all your receipts up to Baltimore in the form that they --

MR.PARKER: Up to New York.

Q -- up to New York in the form in which you received except for money which then you oftentimes put into money orders and send them? So you never send cash up to New York?

A No, we don't.

Q Okay. I asked you before if you knew a Dr. Harold Harrison. Do you?

A I don't know him personally. I think I may have met him once at a fund-raiser but I'm really not -- I think I met him once.

Q Okay. Are you aware that he made a contribution to Citizens for LaRouche for $250?

A Yes.

Q How are you aware of that?

A I'm aware of it because I purchased a check for it.

Q But you never left?

A No. In other words, what will happen on any given day is that I may either actually get money from someone, right, from Ernest Pulsifer, go and buy a money order for Ernest Pulsifer. What might also happen is, just as part of being in the office, someone might ask me, you

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

know, do me a favor. Go buy a money order for so and so, which I do.

Q Well, describe how you obtain the money for --

A I purchased a cashier's check.

Q You went to --

A I went to the bank with $250.

Q Do you remember which bank?

A I think -- well the bank closest to where -- probably Maryland National Bank, more than anything else.

Q Where is that close to?

A Well, it's close to -- you see, my office at Caplan --

MR. PARKER: If you want to refresh your memory, there's a copy.

A There you go, Maryland National Bank. I mean it's close to any number of different places. Maryland has more branches than any other bank, so, you know, I tend to buy a lot of money orders and checks and --

Q Do you have a savings account at Maryland National Bank?

A Sure.

Q Do you have a checking account there?

A Yes.

Q So you went to Maryland National Bank and you purchased a money order?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: Cashier's check.

A Cashier's check.

Q For how much was the cashier's check?

A $250.

Q And what was printed on the cashier's check when you bought it?

A Customer request by Debra Hanania Freeman.

Q And then subsequent to that didyou type anything on that check?

A I didn't type anything on it, but I can see that there was something else typed on it to identify who the contributor was.

Q Okay. Now, did Dr. Harrison give you money to purchase this check?

A He didn't give it to me personally.

Q Who did he give it to?

A I honestly don't know.

Q What's your understanding of how Dr. Harrison gave the $250?

A Do you mean in what form?

Q Yes, in what form and to whom?

A I think it was cash, and I honestly don't know to whom.

Q So, who instructed you to pick up a check, purchase a cashier's check, for $250?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I don't remember.

Q Could you give me the possibilities of who it might have been?

A Could have been anyone who, you know, volunteer which might have asked me to do it and it could have been that nobody asked me to do it. I mean I just do it as a matter of routine.

Q Right. Now, how would you know to purchase a cashier's check for $250?

A Well, what happens is that we have these -- I actually should have brought one -- we have these blue cards which are like pledge cards and what it will say on the cards, it has Citizens for LaRouche and a local address and it says, "Enclosed is my contribution for --" you know, and it says the amounts. Sometimes there's a check attached to it. Sometimes there will be money attached to it and that's you know, that generally how the thing is done. It's a pretty routine procedure.

Q Where are these blue cards kept?

A All over the place, my trunk. They're just, you know --

Q You don't have a local office in --

A No, we don't have an office.

Q Have you ever heard of New Solidary?

A Sure.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Do they have an office in town?

A I don't know if it's actually their office. I know campaign publications, which is a distributor for New Solidary and a number of other publications, does have an office.

Q Do volunteers for LaRouche oftentimes meet at that office?

A They don't meet there, no.

Q Do they do work from that office for the campaign?

A Some of them do.

Q Is it possible some of those blue cards could be in that office?

A It's possible.

Q Do you know the location of that office?

A Yes. It's up in the Medical Arts Building, which is the corner of Read and Cathedral Street.

Q I'd like to go over some old grounds. Do you remember how it came about that you were to purchase a $250 cashier's check for Dr. Harrison?

A What do you mean how?

Q Were you instructed to?

A I just-- I don't remember. I mean I do a lot of these things.

Q On the blue cards, let's say that you did this on your own and you were not told to purchase one and you

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

looked at a blue card, what information was on that blue card?

A Usually what is on there is the person's name, their address and the amount of money that they gave, sometimes their phone number and if they gave over $100 we asked them to also fill in their occupation and where they work.

Q If you were purchasing the money order, then Mr. Harrison obviously contributed in cash?

A Yes.

Q Is there any particular reason you purchased a cashier's check rather than a money order?

A I think probably because I didn't want to pay for it. You know, if you have an account at a bank and you want to purchase a cashier's check, you don't have to -- it was either that I probably didn't want to pay whatever the fee was for it --

MR. PARKER: The money order fee?

THE WITNESS: Well, this one was a cashier's check. See, if you get a cashier's check you don't have to pay. It's 50 cents or 75 cents. You don't have to pay it. The only other possibility is that sometimes I'm not sure whether the amount is you know, whether it's for two fifty or not, or sometimes they'll only give you a money order up to a certain sum of money and then they tell you, you

PERCAD CO., BAYONNE, N.J. 07002 - FORM 746

know, you should get a cashier's check.

Q If Dr. Harrison contributed in cash, where would the cash have gone?

A What do you mean?

Q Where was the $250 cash that Mr. Harrison contributed?

A I don't understand what you're asking me. I mean, do you mean --

Q Well, you found on the blue card that he contributed $250 cash.

A I'm trying to tell by the date. It might have been done at a fund-raiser. I just -- you know, I really don't know.

MR. PARKER: No. What the question is, is what happened to the $250 cash that Harold Harrison gave you for --

THE WITNESS: I bought a cashier's check with it.

Q You mean you brought the $250 to the bank and said, "Let me have --"

A "I want a cashier's check", right.

Q And was the $250 attached to the pledge card, that blue card?

A I think probably it was either attached to a pledge card or even an envelope that was identified as, you know, being from him.

Q I mean if you have $250 lying with a card, you don't recall where that was kept?

PENGAD CO. BAYONNE, N.J. 07002 FORM 740

A No. I mean it was probably handed to me by somebody but I just don't remember.

Q Okay, so --

A I'm not trying to give you a hard time. I just --

Q No, but I'm trying to understand --

A I know, but I don't want to say something to you. I mean, I could think of any number of different ways but I don't want to say something to you that I can't recall because I don't want to be put in that position.

Q But you do recall going to Maryland National Bank on January 14, 1980, is that correct?

A Well, I recall it, after you guys sent me a notice that I was being investigated. I called New York and asked them for copies of these things. So I'm familiar with the thing.

Q So, did you personally go to the bank?

A Yes, I personally did.

Q And handed a teller $250 and asked for a cashier's check?

A Yes.

Q And they wrote it out per customer request, is that it? What does that say?

A It says, "customer request by Debra Hanania Freeman."

Q And then sometime subsequent after the purchase,

PENCIO CO., BAYONNE, N.J. 07002 · FORM 740

Q And then sometime subsequent after the purchase, where did you take the check?

A I don't know. I know at some point what I did with the check was, I attached a slip like this to it.

Q Could you describe the slip for the record?

A It's a little receipt pad which says on top Citizens for LaRouche with a New York address. It says, name of contributor, address, city and amount of contribution, and if contribution is $100 or more fill out the occupation, place of employment, and address; and what I will do is I'll fill out a little white thing like that and staple it to the check and I mail it to New York.

Q Okay, and where do you get the information to fill out that slip of paper?

A Well, either I ask the person directly, if I get the money from the person, or I'll ask whoever filled out a blue card for the person. I mean if I don't have a blue card, I try to find out who did it, and sometimes I don't have the information and sometimes I just fill this thing out as best as I can and let New York worry about it.

Q So you filled out a form like that for Harold Harrison?

A Yes.

Q Where did you get the information on that card?

A I must have gotten that from a blue card.

PENGIO CO., BAYONNE, N.J. 07002 - FORM 740

Q Is it my understanding that you typed something after you purchased the check on a cashier's check?

A No. There's obviously something typed here. I personally didn't type it. I don't know whether this was typed by someone in Baltimore to identify the check or whether it was typed by someone in New York to identify the check.

Q Would you believe it was typed after you purchased the check?

A It says, Dr. Harold Harrison, in parenthesis, to be picked up by CFL rep.

Q Would you read the whole section there as if it were one sentence?

A "Customer request by Debra Hanania Freeman, Dr. Harold Harrison (to be picked up by CFL representative).

Q Okay. Would you read that another way, reading first the top line all the way through and then the second line?

MR. PARKER: That's what she just did.

THE WITNESS: No, I read it as it was typed.

MR. PARKER: Oh.

THE WITNESS: If you read it across this way, it says, "Customer request by," then there's a colon. Then -- well, it's obviously a different typewriter. It says: "Dr. Harold Harrison to be picked up by Debra

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Hanania Freeman, CFL rep," close parenthesis.

Q Okay. Is that a true statement what you just read?

A Yes.

Q That's --

A That's what it says.

Q Do you know if Dr. Harold Harrison is a customer of the Maryland National Bank?

A Well, that's not what this thing says here.

Q It says, "Customer request: Dr. Harold Harrison."

A Oh, come on. It says, "Customer request by Debra Hanania Freeman". It's obviously two very different typewriters. Only a moron would try to make someone think it's the same.

Q But there's a comma after Freeman, is there not?

A Yes, there is.

Q Well, who would the CFL rep be, Dr. Harold Harrison, or Debra Hanania Freeman?

MR. PARKER: No, it doesn't say that. It says Dr. Harold Harrison (to be picked up by CFL --)

THE WITNESS: Look, I don't really understand this whole thing.

Q When you say this whole thing, what are you talking about?

A This whole parenthetical statement, as a former English teacher, I can tell you is enclosed by everything

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

in these parentheses. This, obviously, is a comma which is then to introduce this other statement.

Q So then --

A I mean that's simple grammar.

Q Well, would you say that you were the CFL rep?

A Sure I was the CFL rep. I'm the one who bought the check. I already told you --

MR. PARKER: But the point is that you don't know what this means where it says, "Dr. Harold Harrison (to be picked up by CFL rep.)" because that wasn't on the check when you sent it to New York, right?

THE WITNESS: That's right.

Q Do you remember who you gave that check to?

A I actually don't remember whether I gave it to someone else to mail it to New York or I mailed it to New York. I generally mail things myself but I, you know.

Q Um-hum. Do you usually send out separate checks or would you wait until you collected a few and send it up at one time?

A Well, we usually get a few every day. You know, there's more than one check which comes in on any given day to a combination of mail and --

Q When you say comes in, is that mailed in?

A Some stuff gets mailed. Some stuff, you know, is just -- which kind of try to collect that at the end of

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

the day.

Q Where do people mail it to?

A To this address in New York. Either it's mailed to --

Q No, excuse me. When you get it, it comes into the Baltimore --

A Oh, it depends. Sometimes I get mail. Sometimes, you know -- it depends on who solicits the money really.

Q Does it ever get mailed into the campaign of Publications, Inc., headquarters at the Medical Arts Building?

A If there's a volunteer there who has to get it there, what it will be mailed to is the person's name who works there.

Q And then how often do you mail up these checks to New York?

A Every day we try to.

Q Okay. Let me ask you if you know these individuals and you can answer yes or no and then I'll ask you how you know them. Lawrence Freeman?

A Yes.

Q How do you know him?

A I am married to him.

Q Is he a volunteer for Citizens for LaRouche?

A Yes.

PINCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Let me ask you a question. These volunteers, are there any official -- are you given any official title, is anybody --

A No.

Q So everybody's a volunteer, there's no head of the volunteers in Maryland?

A I think that -- I think -- I'm not positive what his title is but I think that my husband is some kind of overall coordinator.

Q Not necessarily in Baltimore, or in Baltimore?

A I think his title is Mid-Atlantic Coordinator.

Q Could you tell me what that region consists of?

A I'm not sure. I know that -- I know that most immediately we worked very closely with Washington D.C. because it's such a small area.

Q Who would be the person he would work with most likely in Washington, D.C?

A I don't know. I mean I don't know if there's a legal coordinator. I know there are individuals there, you know, who do things.

Q Could you just name a couple of these --

A Richard Cohen, Stewart Rosenblatt.

Q And your husband is the coordinator for the region so he would have reason to talk with people in Washington --

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q -- to coordinate functions like that fund-raiser that we're talking about?

A Sure, sure.

Q Does he deal with anybody in Delaware?

A I don't think so.

Q New Jersey, is that considered part of his region?

A I don't know.

Q Okay. Well, other than Washington, do you know of any other area that he might have contact with?

A Used to be -- used to be Richmond, Virginia, but we had a couple of people who are volunteers down there, but they've since moved.

Q How does one become a volunteer for Citizens for LaRouche?

A Well, you know, citizens for LaRouche puts out leaflets a lot and you might see someone on a street corner giving out a leaflet or giving out a brochure and people will express interest. Also what happens, and the way that I think we get most of our names, is when LaRouche goes on T.V. There's always a telephone number, you know, and there's thousands of people around the country will call in. They'll be asked to give their name and number and asked if they want to help out. New York usually sends them a mailing.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

Q Is that toll-free number in New York?

A I don't know. It's an 800 number. I really don't know where it is.

Q You never answered an 800 phone down here in Maryland?

A No. You know, then we're given those names.

Q But you know Mr. LaRouche personally?

A Yes.

Q All right. Did he say to you,"Debra, I'd like you to, you know, help me out with my campaign down in Maryland"? Has he asked you to do --

A No, he's not the one who asked me.

Q Felice?

A Felice asked me.

Q Well, how did she come to you and when did she come to you?

A Well, you see, I worked for Mr. LaRouche in '76 whenhe ran for President the first time. I volunteered for him then. So, he decided to run again in 19 -- I think he actually announced in '79. Most of us who worked for him then were called back and said, "Look, you know, do you want to help out?" And of course, most of us did.

Q So, Felice called you up and said, "Linden LaRouche isrunning again for the Presidency. Would you, you know, coordinate things for us down in Baltimore?"

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I'll tell you the truth, I really don't -- I mean I can't exactly remember how I came. I just, you know, I'm a friend of his. I worked for him in '76. I don't remember. I suspect it was probably Felice because she's the person who I most often talked to, but it was really kind of natural that I would be a volunteer for him.

Q You're not given anything written saying that you're a LaRouche volunteer?

A No, no.

Q Do you know Robert Primack?

A Yes, I do.

Q How do you know Robert Primack?

A Well, he used to live in Baltimore, he doesn't any longer. He's a friend of mine. I've known him for a number of years.

Q Does he work with Citizens for LaRouche?

A He did some work for us down here. He's in New York now. I don't know if he still does work with Citizens for LaRouche.

Q Nancy Radcliffe?

A Yes, I know Nancy.

Q Does she work for Citizens for LaRouche?

A Yes, she does.

Q How do you know her other than through that?

A She's an old friend of mine. I know her from

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

several years.

Q Do you know if she's made contributions to Citizens for LaRouche?

A Sure, she has.

Q David Sanders?

A He's not a volunteer.

Q How do you know him?

A He's a supporter. He's not -- well, I shouldn't say he's not a volunteer. I mean, I think he's probably given out brochures at one time or another --

Q But he wouldn't be the same as you or your husband or Nancy Radcliffe?

A Right, he's -- right, he's really a different category.

Q And he's made contributions?

A Yes.

Q And you met him at fund-raisers or --

A I've met him -- he's a friend. I know him.

Q Kevin Salisbury?

A I know Kevin.

Q Is he a volunteer for Citizens for LaRouche?

A No, he's not, but his brother is LaRouche's campaign chairman.

Q And what's his name?

A Alan Salisbury.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q And Ann Taylor?

A I don't know Ann Taylor.

Q Do you know if she's made a contribution for Citizens for LaRouche?

A Well, I know her name was on the letter she sent me and after that I checked a print-out, you know, a print-out of contributors for Maryland, and her name is indeed on there.

Q But you've never met her?

A No, I haven't.

Q And you never received a contribution from her personally?

A No.

Q Ernest Pulsifer?

A I have met him.

Q Is he a volunteer?

A No, he's not.

Q Is he a contributor to Citizens for LaRouche?

A Yes. I presently receive a contribution from him.

Q Could you relate the circumstances?

A Yes. We met him on the street, I believe, at a leaflet thing. He was given me and I called him up and my husband and I arranged to meet him for a drink.

Actually, I remember the thing very specifically

PENCAD CO., BAYONNE, N.J. 07002 - FORM 240

because we were doing something else there that day. We met him at the Belvedere Hotel.

Q Could you recall approximately the date of this?

A I really couldn't. I mean -- I'll tell you what I do remember. It was before the December 9th fundraiser, --

Q Okay.

A -- because what we were doing is I was trying to sell him tickets to the fund-raiser actually and he gave his contribution that night.

Q And then you met him for a drink at the Belvedere Hotel?

A That's when we got the contribution from him.

Q At the Hotel?

A Yes.

Q And what was the amount of the contribution?

A I'm pretty sure it was $150.

Q Was that in cash?

A Yes.

Q Okay. Charles Clark?

A I know Charles.

Q Is he a volunteer for LaRouche?

A He's not a volunteer, but he's a very close supporter.

Q So he's made contributions?

A I am sure he has.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Have you ever received any contributions from him?

A I've been there while Charles has given contributions. He tends to give, you know, small contributions. He's a blue collar worker. I don't know if I've ever personally solicited contributions.

Q He usually gives you $10 cash here, $20 cash there?

A Something like that. Yes.

Q Okay, Felice Gelman?

A Oh, sure I know Felice.

Q She's Treasurer of Citizens for LaRouche?

A Yes.

Q Did you know her before she was Treasurer?

A Oh, yes.

Q Could you relate your relationship?

A College friends.

Q Mary Cavanaugh?

A Mary Cavanaugh, I do know, yes.

Q Is she a volunteer?

A No, she's not.

Q Is she a contributor?

A I believe so, yes.

Q Have you ever accepted any contributions from her?

A I think I have, yes.

Q Do you recall the amounts and when that was?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I know she bought a ticket to the December 9th fund-raiser. I remember that.

Q Did she give cash?

A I'm not sure.

Q Let me ask you a question. To the best of your knowledge, are all the money orders that have been purchased, purchased because the Citizens for LaRouche or the volunteers received cash first?

A No, not always. What happens sometimes is that when someone makes a contribution they don't want to do it on their checking account for any variety of reasons, ranging from they don't want their wife to know they're make a contribution or some people are just very nervous about contributing to political campaigns.

So, very often, especially when we get these in the mail, we very often get money orders.

Q So, the most part though, it would be cash because as you were describing, you were getting a lot of cash?

A Well, not most or less. I would say 50/50, whatever.

Q Steven Warm?

A I know Steve.

Q Is he a volunteer for LaRouche?

A He isn't any more. He used tobe.

Q Is he a contributor as far as you know?

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

A As far as I know.

Q Have you ever received a contribution from him?

A Yes.

Q Do you remember the circumstances, was it at a fund-raiser?

A He's given money at fund-raisers but he's also given money through some personal means.

Q And he would hand you some cash or something like that?

A He usually pays by check.

Q Do you know him from before citizens for LaRouche?

A Yes. He was my campaign treasurer.

Q In 1978?

A Right.

Q Belinda F. deGrazia?

A Yes, I know Belinda.

Q Is she a volunteer for that?

A Yes, she is.

Q And to your knowledge, has she made a contribution to --

A Yes, I'm sure she has.

Q Have you ever personally received money that she's contributed?

A I don't think so. I mean, I've seen her checks.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

I've mailed her checks.

Q Robert A. Robinson?

A Robert Robinson is a volunteer, not here in Baltimore. He's in Washington.

Q He's District of Columbia?

A Yes, Washington D.C.

Q Is that one of the people that you or your husband would coordinate events when you do the Washington/Baltimore?

A No. He's not someone who tends to coordinate anything.

Q Do you happen to know where he lives?

A Do you mean precisely where?

Q Does he live in the District, or Virginia, or Maryland?

A Well, I'll tell you, he used to live in Baltimore and I know he used to live in the District and I think now he may live in Arlington.

Q How long ago did he live in Baltimore?

A Last year. He hasn't been in D.C. all that long. His folks live in Baltimore.

Q And Edward St. John?

A I have met him on occasion.

Q Would you consider him a volunteer for LaRouche?

A Oh, no.

Q Is he a contributor?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A He's purchased tickets.

Q And has he given you the money for the tickets?

A I'm not sure whether I got the money from him personally or not.

Q Okay. Do you remember if he paid in cash or by check?

A I think both.

Q What makes you think both?

A I just seem to recall sending a check up. I just really don't remember. I mean, I remember purchasing a money order for him at one time, but I also think -- I think that we've sent checks up from him also.

Q Okay. Arthur Murphy?

A He's a volunteer.

Q In the Baltimore area?

A Yes, in Baltimore.

Q And would you know if he was a contributor also?

A I think so. Most of the people who are volunteers tend to also be contributors. It's hard to be a volunteer at a fund-raiser that you haven't bought a ticket for.

Q Constantine Philios?

A I don't think I know him.

Q You've never heard the name?

A I know the name Philios. I think I may know his wife, but I really can't say for sure.

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

Q To the best of your knowledge he's not a volunteer for Citizens for LaRouche?

A Oh, no, he's not a volunteer as far as I know.

Q All right. To your knowledge, has he contributed to Citizens for LaRouche?

A I don't know.

Q Rustom Ghandi?

A I know him. He's a -- he's not a volunteer. He has a brother who's a volunteer.

Q Okay. To the best of your knowledge, could you give me a list of all those people you purchased money orders for?

A I couldn't possibly.

Q Okay, because I know as we've been going through you mentioned that you purchased for -- I think you just mentioned you purchased one for, was it Edward St. John?

A I know that a money order was purchased for him. I don't know whether I purchased it or someone purchased it, but I know that I processed a money-order for him.

Q Is there anyway you can recollect which contributors had money orders purchased for them?

A No, and as a matter of fact, on the contributors' print-out, I don't even think money-orders -- you know, we get these print-outs from New York and what it will say on there is the date of the contribution, contribution and

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

it will say whether it's a charge or a check, but I think money-orders are just listed by check, so I really don't, you know, I don't know. I mean we don't keep copies of anythng in that sense.

Q Besides Felice Gelman, who else would you communicate with in New York?

A Felice is really the only one on this campaign.

Q And how often would you say you're in touch with her?

A Oh, it depends on what we're up to. We're in touch pretty regularly.

Q Once a day, once a week?

A Less than once a day, but usually more than once a week.

I should mention also that Felice is a friend of mine so that -- I mean we don't always-- we talk a lot, not always about LaRouche's campaign, sometimes about her daughter, you know, I mean we just talked.

MR. BOGIN: Off the record.

(There was a discussion off the record.)

Q I'm just going to go over some of the things we probably already covered. You mentioned that Steven Warm is no longer a volunteer. Is there an explanation for that?

A I think his job just was, you know, too pressing.

PENWOOD CO., BAYONNE, N.J. 07002 - FORM 740

Q He still lives in Baltimore, did you say?

A Yes.

Q Do you happen to know where Nancy Radcliffe lives?

A Yes, I do.

Q Could you give me the address?

A It is on 31st Street between -- I think between Calvert and Guilford.

Q Does she live in an apartment building?

A It's a rowhouse.

Q You don't happen to know the number, do you?

A No, I don't.

Q Do you know where Kevin Salisbury lives?

A I don't. I know he lives in west, the western part of the city, but I don't actually know where.

Q You said he wasn't a volunteer?

A No. He's not.

Q His brother's related to the campaign, but --

MR. PARKER: No, his brother is.

Q Right, his brother's related to the campaign but--

A Kevin's not.

Q -- Kevin's not. Do you see him once a week, would you say?

A No, I don't see him once a week.

Q Do you know where David Sanders lives?

A He lives back of 25th Street on the other side of

REPORT CO., BAYONNE, N.J. 07002 - FORM 740

Greenmount Avenue but I don't know his address. I've never been to his house.

Q Okay, but it's in Baltimore?

A Yes, it's in Baltimore.

Q And as far as you know he's still living in Baltimore?

A Yes.

Q Okay. Do you happen to know where Harold Harrison lives?

A Well, I just, you know, would open his letter and that has 3900 North Charles.

Q But besides seeing it in a letter, would you have known any other way?

A No.

Q All right. You filled out the contributor part for him --

A Yes.

Q -- that you sent with the cashier's check.

A Right.

Q And I assume a document that looks like this?

A Yes.

Q When I say this, for the record, I mean --

A Well, I should say something. This, the thing like this that is from Harold, I don't think that was sent with the check but I honestly don't know. I think it was

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

gotten after the check. I'm rot positive.

Q Okay.

A But that was a separate thing.

Q Let's discuss, let's go over a typical scenario.

MR. PONDER: You have to identify that for the record.

Q Okay. For the purposes of identifying one of the documents for the record that we're talking about, it's a sheet of paper with an amount of a contribution and the date and it's signed by the contributor with his address.

We have already discussed that you purchased a cashier's check for Harold Harrison.

A Right.

Q And you took that back to your house?

A I don't know where I took it.

Q And you filled out a contributor form?

A I filled out a little receipt which I described to you.

Q It has the name of the contributor?

A Name, address, don't know whether it has phone number, and since his was two-fifty, which makes it over a hundred, I probably asked him to fill in his occupation.

Q And then you took the check and that contributor information and stapled it together?

A Yes.

Q And mailed it to New York?

A Right.

Q Along with any other checks you might have had at the time?

A Probably.

Q That contributor information, could you give me how you knew to fill that out?

A I was probably provided with it through some form.

Q All right. When you first became a volunteer, Felice Gelman was probably in touch with you. Did she give you instructions on how to fill out these forms and why they were necessary?

A She told us in the very beginning -- I mean her instructions were that we couldn't turn in contributions of over $100 unless they were, you know, in cash, unless they were identified as belonging to somebody. In other words people couldn't just, if you were passing a hat around, -- and we do this at fund-raisers -- we tell people if they're going to put cash in they can't do it for more than $100. If they want to dothat they have to fill out a pledge card. So, we got that procedure done.

We were told that if we get money orders for people we have to have signed statements. We know that contributions up to $250 are matched but that you can take a

PENGAD CO., BAYONNE, N.J. 07002 FORM 740

contribution of up to $1,000.

Q When you say matched, what do you mean by that?

A Matched by you generous people at the Federal Election Commission.

Q With federal monies as well?

A As far as I know.

Q Matched up to the first $250 of a contribution?

A As far as I know, yes.

Let's see, what else can I tell you.

Q Tell me more about the form. You were sent them, sent the forms?

A Yes. We received that address from New York.

Q And for their written instructions or did you talk to Felice on the phone?

A Both, both.

Q And she gave you the instructions both written and orally about what you had to do with this information?

A Yes, sir.

Q Was that the only training that you had, or instructions, basically, fromthe phone and from the mouth?

A I mean we never had a class on it or anything like that.

Q There's no work shop or anything --

A No.

Q -- all volunteers across the country?

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

A No.

Q When you do the collection, at some occasions you mentioned that you collect through passing the hat?

A Right.

Q And you collect the money?

A Right.

Q And you instruct people not to put in more than $100.

A (Witness indicates yes.)

Q What do you do then? Do you just purchase a money order with that?

A Yes. What we'll do is we take the whole sum of money, purchase a money order for it. We identify it as coming from a particular fund-raiser. We have to put down the place of the fund-raiser, place, time -- and I don't know whether it's for your, you know, for your purposes or not but we also try to fill in how many people attended, how much money total was raised, how much in passing the hat, how much in checks, stuff like that.

Q Do you remember what a possible sum in any of these fund raisers were from passing the hat, what the sum total in the hat was?

A I really don't know.

Q Was it $500 or $1,000? What was the largest amount that you remember?

PENNSAID CO., BAYONNE, N.J. 07002 - FORM 740

A I really couldn't give you a figure.

Q Have you ever taken money from the hat and purchased a money-order with it?

A No, I don't usually do that.

Q The person who does it, they purchase the money order and then the money order is sent to New York?

A As far as I know, yes.

Q Do you know what information is supplied on that money order?

A I've never done it myself. I'm pretty sure that was supplied on there.

MR.PARKER: Well, don't guess.

A Yeah. I really don't. I think it's just the event, the event itself.

Q You mentioned before that a person can only contribute up to a thousand dollars.

A Right.

Q Do you know why that's so?

A I think it's just -- rule. I mean, I don't know why.

Q Are you aware that there's a limit of $1,000 per contributor for LaRouche?

A Yeah, that's what I meant.

Q How do you keep track of small contributions?

A I actually don't. I depend -- I really depend

PENNAO CO. BAYONNE, N.J. 07002 · FORM 740

entirely on New York to do that. I know on one occasion that I can recall, we sent a contribution up, for instance, which was over the limit; but when that happens -- see, we don't -- I mean because we don't have an office and don't really have any kind of major operation, we really just do very routine kind of activities and we really leave the -- side on New York to keep records and figure stuff out.

Q But New York only has whatever records you have sent up previous.

A They have what we mailed them.

Q Right.

A And I'm sure, you know, they get contributions on their own.

Q Well, when you pass the hat around somebody might contribute $50. Would New York know that there was an individual there who contributed $50, the name of that individual?

A I don't know. I mean it depends if the individuals identify themselves.

Q But you don't require that he identify himself when you pass the hat around?

A If a hat is passed, people usually just throw in in individual contributions.

Q Is it possible that this same individual might be at various city functions and more thanone function --

PENNCO CO. BAYONNE, N.J. 07002 - FORM 740

A Sure.

Q -- where the hat is passed? Is it possible that each time he puts out $50?

A I suppose anything is possible.

Q Well, if that were possible and let's say he was there --

MR. PARKER: Well, she doesn't know.

Q We're talking about possibilities. If that happened, wouldn't then the person have contributed a couple hundred dollars by this time?

A I suppose that's all possible. I mean we take whatever safeguards we can and depend on people's honesty.

Q But you would really have no way ofknowing how much that person might aggregate in terms of contributions?

A Well, let me explain something to you. At a fund-raiser, the way this thing works is, we don't -- passing a hat around is, that is a bottom line. Usually there is bidding, you know, "Would anyone here like to contribute $1,000?"

"Would anyone like to contribute $500?" And that's when people raise their hand and either checks are collected from them or they fill out pledge cards and promise to give the money on a certain date.

We usually work our way down to $25. Below $25 -- we're not going to start taking $10 bids so below

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

$25 we tend to -- you know, I'll pass the hat around and try to get, you know, for people who are not in a position to give lots of money and want to thrown in five or ten bucks.

So, it's very unlikely because we, you know -- you know what fund-raisers are like. You put a lot of pressure on people to give money, so somebody is going to give $50 they usually want us to know that so that we stop bothering them all night and say, "How about more money?" You know. It just stands to reason.

Q I understand the reasons but basically you don't really keep track of the smaller contributions?

A I don't keep track of anything.

MR. PARKER: Well, she doesn't do it because she never was involved.

THE WITNESS: It's really not my function. I mean I just --

Q Who is head of the fund-raisers then in this area?

A There isn't any head of the fund-raisers.

Q Well, who's responsible for keeping track of these things?

A New York's responsible.

Q Does New York come down to the fund-raisers?

A Very often they do. I mean they usually send speakers down also.

PENNSIP CO., BAYONNE, N.J. 07002 · FORM 240

MR. PARKER: As a matter of fact, what we're suggesting is that you take your inquiry to New York and leave these poor people in Baltimore alone.

Q You've been to these fund-raisers where they pass the hat.

A Yes.

Q Have you personally passed the hat?

A No.

Q Do you know anybody, have you seen anybody pass the hat? When you say pass the hat, does somebody go around and --

A No, usually what happens is you give it to the first person in an aisle and people will just pass it from hand to hand.

Q And then do you know who usually ends up with the hat at the end of this fund-raiser?

A No, I don't.

Q Have you ever ended up with the hat at the end of this fund-raiser?

A No.

Q Then the money in the hat is used to purchase a money order?

A As far as I know.

Q And then it's sent to New York?

A As far as I know.

PRINTING CO. BAYONNE, N.J. 07002 - FORM 740

Q So when you collect contributions or receive contributions from various sources, is it usual that you personally will send it up to New York by mail?

A Very often.

Q Do you ever wire money up to New York?

A No.

Q Do you enclose a list of contributors up to New York with checks? Do you have a separate list saying, "Enclosed in this envelope are contributions from the following people?"

A No.

Q Or any totals?

A No.

Q Is there any cover letter?

A No. I just usually shove the stuff in an envelope. I mean, I let them know by phone that it's coming but I don't -- I don't really tell them what's in there.

Q Are you aware that each contributor has to sign their names that they've made a contribution in some form?

A I'm aware that they have to do it to a certain point. I mean, as I understood it, people are able to make small contributions without signing their name.

Q At what point do you need to have their signature?

A We try to get it when they actually make the contribution.

Q When you purchase a money order with money that

PENNSA CO., BAYONNE, N.J. 07002 - FORM 740

is supplied, do you have the contributors sign the money-order?

A Sometimes we do but we never purchase a money order unless a contributor has consented to its being purchased. I mean we don't just routinely go out and do it. I mean, at some point, somebody lets the person know that we can't, you know, that the only way we can get it to our New York office is by purchasing a money order and it's, you know, at that point.

Very often if we purchase a money order for someone they don't sign the money order and as I understand it from my own instructions that's okay, as long as they sign something else which notes that they contribute the money on a certain date.

Q And then you send everything up to New York?

A I send it up as soon as it's in any kind of sendable form.

Q Do you maintain a list in Baltimore of contributions and contributors?

A We have a computer printout.

Q Sent from New York?

A Right.

Q You don't generate your own list in addition to any computer print-out?

A No, we really don't.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q All right. Does your husband sometimes send the mailing out of those checks that have been received of those contributions?

A He usually doesn't get involved in the mailing but it's usually done.

Q That's usually what you do?

A Not always. Any number of different people.

Q Do you know who else might send?

A Any one of the volunteers might do it. And you should know that I don't, you know, I don't have a particularly unique function in this whole thing so --

Q What amount is too small to require the documentation of contributor information?

A Well, what we try to do is -- I mean any amount that we get, you know, we try to get documentation for it because as I understand it, as long as we have documentation the money is matchable. So, we -- you know, we try to get it for anything.

Q Is there a figure that you need it, you must have it?

A I don't know.

Q That printout that you get from New York, is it sent to you?

A It's usually sent to our house. Sometimes, you know, if we are visiting in New York we pick it up.

PENNAS CO., BAYONNE, N.J. 07002 - FORM 740

Sometimes it's sent to other people.

Q All right. How often would you say in the past year you went up to New York?

A Well, my folks live up there so I go up all the time.

Q Once a month?

A Sometimes.

Q Okay. I have some documents which I am going to ask you to identify.

A Okay.

Q And I'll mark it as exhibits after you identify them. I have here a Xerox copy of two personal checks of yours, one entitled Dr. Debra J. Hanania at 4004 Linkwood Road, for $50 and one that has your name, Debra J. Hanania, and your husband's name, Lawrence K. Freeman, for $40. I just want you to look and see if you can identify --

MR. PARKER: Do you have more than one copy of these things or not?

MR. BOGIN: No, but they will be attached to the deposition.

A They're my checks.

Q Your signature, your checks?

A Yes.

MR. BOGIN: Okay. I can write these checks to be marked the next number -- I guess it's Commission

BERGAN CO., BAYONNE, N.J. 07002 - FORM 740

Exhibit No. 12 -- which are two personal checks, one for $50 and one for $40, of Debra J. Hanania. She's identified them as her own.

(Whereupon, Commission Exhibit 12 was marked for identification.)

Q I have another personal check from Debra Hanania for $15. Can you identify that check as yours?

A Yes, sur, that's mine.

MR. BOGIN: Okay. I'd like to mark that personal check for $50 as Commission Exhibit No. 13.

(Whereupon, Commission Exhibit 13 was marked for identification.)

Q I have here a Traveler's Express Money Order payable to Citizens for LaRouche with the drawer being Kevin Salisbury. The money order number is 2957627. I ask you to look at that, then whether or not you have ever seen that money order.

A You know, I don't know. I looked at this before. I have copies of this and it doesn't look like my handwriting, but it could have been. We have a signed letter that's attached to this thing which has Kevin's signature on it. I don't believe this is Kevin's signature.

Q Okay. So how do you know that that might not be Kevin's signature?

A Well, I know, because when you people sent me a

PENGAD CO., BAYONNE, N.J. 07002 - 1(800) 631-6989

letter, I called New York and I asked New York -- I knew exactly, you know, what your problem was. I asked New York for copies of the signed letters.

Now, I asked for a signed letter from Kevin, so I know that the signature on that letter is in fact his.

I may have purchased this for Kevin or not. It doesn't really look like my handwriting but I don't know. It could be.

Q So you can't identify that as your handwriting?

A No, I can't positively, no.

Q It's possible that it's your handwriting?

A Well, I mean, I suggest you know, you know very clearly, I mean, I'm not denying that I purchased money orders and you know, billed in an individual's name. I don't know if I did on this particular one. I don't think so. I can't really identify it as my handwriting.

Q Okay. I'd like to --

MR. PARKER: But what you do know is that Salisbury did in fact contribute $150, --

THE WITNESS: I absolutely know that.

MR. PARKER: -- and signed a letter.

THE WITNESS: I know that we have a signed letter. I mean I asked him to sign a letter. He actually did it in front of me.

MR. BOGIN: Okay. I would like to mark this

PENNAR CO., BAYONNE, N.J. 07002 · FORM 740

CommissionExhibit No. 14. That's that Traveler's Express Money Order signed by Kevin Salisbury.

(Whereupon, Commission Exhibit 14 was marked for identification.)

Q I have a Federal Express Money Order No. 113833058, payable to Citizens for LaRouche from David Sanders and I ask you if you can identify that money order?

A Yes.

Q How do you identify it? Is that your handwriting?

A Yes, it is.

Q You purchased the money order?

A Yes.

Q And that's your handwriting?

A Yes, and there is a signed letter from David which was attached to it.

Q But the signature that is on that money order is yours?

A Yes.

MR. BOGIN: Federal Express Money Order by David Sanders should be marked Commission Exhibit No.15.

(Whereupon, Commission Exhibit 15 was marked for identification.)

Q Now, you mentioned that you had Mr. Sanders sign the letter in front of you.

PENRAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q Do you recall basically what it said?

A I think I have a copy of it here. It's -- what it says on it, it says exactly what this thing says,"I contributed --" Let's see, which --

Q Take your time. Maybe you can find it.

A Let me just ask you, which was the amount because he's given a number of contributions. $45?

MR. PARKER: $45?

THE WITNESS: Yes.

Yes, it says, "I contributed $45 to Citizens for LaRouche on 11-25-79," and then it's signed David -- I guess C. Sanders. 615 St. Ann's Avenue, Baltimore, Maryland, 21218. And it says, "If contribution is over $100, fill in." and since he has accumulatively given over $100 it says, "Lab technician, State of Maryland, State Office Building on Preston Street, Baltimore, Maryland 21210".

Q What's the date of that letter?

MR. PARKER: 2-23-80.

Q 2-23-80?

A Um-hum.

Q Okay. This Federal Express money order 113833058 is dated November 25th and November 28th.

MR. PARKER: That's what she just read, "I contributed $45 to Citizens for LaRouche on November 25,

PEGASUS CO., BAYONNE, N.J. 07002 - FORM 740

1979." That's what the letter says.

Q Okay, and what's the date of that letter?

A The date up in the corner.

MR. PARKER: February 23, 1980.

Q February 23, 1980. Okay. I have here a letter from David Sanders dated December 28, 1979. It says, "Dear Citizens for LaRouche: This is to certify that I personally contributed $45 in the form of money order payable to Citizens for LaRouche on November 28, 1979. Sincerely, David Sanders." Do you recognize that letter?

A I absolutely do. This is not a letter that was submitted to New York as far as I know. This was a letter which was typed by me as a sample to our volunteers in terms of what they had, the information they had to have. I used David as a sample because I had his check in front of me. But this is not -- this isn't David's signature and this is not meant to be a letter. And if it was submitted to you by anybody, it was submitted in error.

Q Sir, as far as you know you didn't send that up to New York?

A I don't think I did, no. As a matter of fact I am sure I didn't. This was hanging on a bulletin board in my office for about six months.

Q But it is a copy of --

A It is indeed a letter and it says all the things

you said.

Q And it's signed by you?

A Yeah.

Q You signed David Sander's name on that letter?

A Sure. It's a sample.

MR.PARKER: But you didn't furnish any such document to the Federal Election Commission?

THE WITNESS: No, absolutely not.

Q And you didn't send it up to New York?

A No, I didn't send it to New York.

Q But it's possible that it was sent to New York?

A Anything's possible. If it was sent to New York, it was a stupid mistake.

MR. BOGIN: Okay. I would like to mark this letter dated December 28th, 1979, with the signature of David Sanders on it as Commission Exhibit No. 16.

(Commission Exhibit No. 16 was marked for identification.)

Q Okay. You said that that document, that letter of December 28th, 1979, was hanging on your bulletin board for six months. When you say six months, until very recently?

A To tell you the truth, it may still be hanging on my bulletin board.

Q And the bulletin board is where?

PENNEY CO., BAYONNE, N.J. 07002 - FORM 740

A I have a little office area in my house. It's not really an office. It's a den. You know, I have a bulletin board over there and I stick things on it.

Q So you have the original?

A I don't know whether mine is an original or a Xerox. See, what I did, was I Xerox'd a number of copies of this and I gave it to the people and I said, "Look, you know, you have to get signed copies."

This was -- see, we have -- this exact form, by the way, is the exact form that we got from New York.

Q When you say this exact form, it's --

A This is your -- I don't know what this is.

Q This is Commission Exhibit No. 4.

A All right. This exhibit here is the precise form of the letter we were sent from New York, but before we actually received these -- and at one point we had run out of them -- I didn't have a blank form to give people so I wanted to make sure people knew what kind of information to put out. So we do something like this, which is your Exhibit No. 16; and I must have Xerox'd -- I don't know, there are 25 volunteers -- I probably Xerox'd 25 copies of it.

I don't know whether the one I have is the original or the Xerox, but you know, they are tacked up in my -- in my house.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 240

Q So for the David Sanders' contribution of $45, did you purchase a money order for him for $45?

A Yeah, I think I did.

Q And then sometime subsequent to that you had him sign a letter --

A Yes.

Q -- saying he made a contribution? When did he giveyou the $45?

A On a date that is on his letter. I can remember. Sometime in November, I think.

Q Okay. So, did he give you the money before you purchased the money order or did he give you the money after you purchased the money order?

A He gave me the money before I purchased the money order. It would be hard to purchase a money order with no money.

Q But you could use your own money.

A But I wouldn't do that.

MR. PARKER: In fact you never did that, did you?

THE WITNESS: No, I never would do such a thing.

Q On the letter that David Sanders signed, it was dated February '80, sometime in February '80 --

A Something like that, yes.

Q -- when was the money order sent to New York?

A Back in November.

PENCAR CO., BAYONNE, N.J. 07002 - FORM 740

Q And then subsequent you sent the letter confirming the contribution with his signature on it?

A Yeah.

Q How did it come about that it was four months in between?

A Well, you see, when we do these things I try to get the letters up right away within a matter of a day or two.

Now, what happens is that sometimes I don't know whether the problem is that we don't send them the letters or whether they lose the letters. What will happen very often is we will get a call, usually around the time, I guess, that we make a submission to the FEC when they actually go over their books.

We've got to call them and say, "We don't have things on file from, you know, Joe Smith, this person, that person and that person."

Q You'll get the call from FEC?

A No, no, I'll get a call from Felice and she'll say, "I don't have this stuff." You know, sometimes if I know the person I'll volunteer to get the letter. "Oh, that's all right. We can get a letter from them."

Sometimes I don't know who the person is and I'll say, "Well, you should getthe letter," and I think what they do is they mail the person a form asking them to confirm the

PRIVATE I.D., BAYONNE, N.J. 07002 · FORM 740

contribution but by and large what we try and do is actually get the whole thing done at once because it just saves a lot of bother and a lot of phone calls back and forth.

Q To make sure there's no ambiguity, Commission Exhibit No. 16 is your handwriting --

A Yes.

Q -- of David Sanders' signature.

A Yes.

MR. BOGIN: Off the record.

(There was a short recess taken in the deposition.)

- - - - - - - - - -

Q Familiarize yourself with Commission Document Nos. 15 and 16. The Federal Election Commission receives this money order from David Sanders with this supporting letter, meaning Exhibit 16, for matching purposes.

What explanation can you give that the commission would get these two documents though David Sanders is both times signed by yourself?

A Well --

MR. PARKER: She's already explained it in great detail.

THE WITNESS: Yeah, I have explained it and, you know, I have never, beyond my own campaign, submitted anything to the FEC so I can't explain what has or hasn't

PENNAD CO., BAYONNE, N.J. 07002 - FORM 740

been submitted to you.

Q It surprises you that this letter should show up at the Federal Election Commission?

A Yes, it does, greatly surprises me.

Q You say that the December 20th, 1979 letter is a sample letter?

A Yes.

Q How many samples did you make of the letter?

A I Xerox'd it. I could have Xerox'd anywhere from 20 to 25. I furnished volunteers with copies of it.

Q And the volunteer comes in and you say, "This is the information you should get?"

A Right.

Q "And it should look this way"?

A Right.

Q "And be signed by the contributer?"

A Right.

Q And what other instructions do you give the volunteers concerning that type of signature letter?

A The only other instructions I give them is that if it's an amount over $100 that they should please try to get information on where the person works, and that's usually all I give them.

Q What other kinds of form does Citizens for LaRouche use when they want a contributor's signature letter?

REGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Well, there's this particular kind that we've been discussing. There's another form that we have when an individual writes a check and I'm trying -- I'll tell you the truth. I don't remember the exact wording but we do have a form because very often one person will give a contribution in his name. It's a contribution that comes from himself and his spouse. So then we have a letter that says, "I made this amount of money contribution on such and such a date and it should be understood that this contribution is given, you know, from myself and my wife." Then we ask both people to sign it.

And then there's another letter that has to do with when someone signs a check which might appear to be a business account but it's not. As I understand it, as long as it's not incorporate funds -- in other words, as long as the person is not incorporated and is the sole owner of his business, then he has to -- he can write that kind of check but what he has to make clear is that it was drawn from his personal funds or something like that. I don't remember the exact wording but there are a number of these different letters.

Q Could I see a copy of theletter, the February letter that's signed by David Sanders? Where did you get a copy of this letter from?

A From David.

Q From David Sanders but how do you have a copy in

his file now?

A Linden mailed it to New York and then I called New York and I said, "Look, you know, I want copies of all this stuff." They asked me why. I said, "I got a letter from the FEC indicating, you know, that there were problems with these people's contributions and I just want copies of all this stuff." And Felice actually -- they weren't mailed. Felice brought them down.

(There was a discussion held off the record.)

Q Do you recall any other contribution submitted that you received and sent up a letter similar to this one?

A What do you mean?

Q When I say this one, I mean Commission Exhibit No. 16. What other contributor, do you recall, signed a letter similar to this that you sent up has accompanying documentation to a money order that has a purported signature of a contributor?

A I'm not sure I understand what you're -- when you say similar to this, you mean this kind of information?

Q This form.

A That exact form?

Q That's in Commission Exhibit 16 where it goes -- this is the sample that you handed out to volunteers though --

A Yes.

PENNAD CO., BAYONNE, N.J. 07002 · FORM 740

Q -- I assume that you would get the exact form with the exact information.

A I wouldn't assume that. That just shows that the information they need. We were waiting for copies of the actual form which New York sent us. I don't know -- I mean I don't know. That's all I can say.

MR. PARKER: Here's the actual form.

THE WITNESS: Where?

MR. PARKER: Right there, what you got in your hand.

Q I show you a document dated 2-23-80 signed with the name David Sanders, 613 St. Ann's Avenue, Baltimore, Maryland, which says he contributed $45 to Citizens for LaRouche on November 25th, 1979, and gives his occupation, place of employment, address, since his contribution is over-- well, it says, if contribution is over $100 he should supply the information and which he did.

Can you identify that document?

A Yes. David Sanders signed this letter in my precense.

Q This is the form that New York sent out to you?

A I think so, yeah. It's -- either this is precisely the form or after the actually sent me a form I might have at some point retyped it but this is the -- this is the general form of all the letters.

PEARL CO. BAYONNE, N.J. 07002 - FORM 740

Q Now, I have a question. This sample document that you had, December 28, 1979, how come you weren't able to get the supporting documentation at the time of your sample, December 28, 1979?

A I actually thought we did have it, to tell you the truth.

Q And then when did you find out that you didn't have it?

A I, at some point --

MR. PARKER: She's answered that question already.

A You know, you get these calls. We get calls and say, "Look, we don't have a file on so and so for a contribution he made on such and such a date. Can you get theletter? Do you want us to do it?"

This particular instance I know David, I've seen him often, so I said, "I can get the letter from David. Don't bother."

Q Do you recall when you were notified by the Commission of reason to believe that you might have violated the election laws?

A I don't recall but probably have a copy in here.

MR. PARKER: February 19th.

THE WITNESS: February 19th.

Q Do you find any coincidence that this confirmation letter is signed February 23rd?

PERMA-CO BAYONNE, N.J. 07002 - FORM 740

A No, I don't find any coincidence.

MR. BOGIN: I'd like to enter Commission Exhibit No. 17 into the record as the contributor information from David Sanders saying he contributed $45 to campaign dated February 28th, 1980. It's Commission Exhibit Document No. 17.

(Whereupon, Commission Exhibit 17 was marked for identification.)

Q I have a check payable to David Sanders from Household Finance for $1009.58. I ask you if you have ever seen this check before, a copy of it?

A I am not sure.

MR. PARKER: Let me see that.

THE WITNESS: I'm sorry. I couldn't say if I've seen it before.

MR. BOGIN: I'd like to enter Household Finance check to David Sanders as Commission Exhibit No. 18.

(Whereupon, Commission Exhibit 18 was marked for identification.

Q On the other side of that check is an endorsement which is pay to the order of Citizens for LaRouche signed by Sanders. Do you recognize or remember the endorsement?

A No. I mean, you know, I don't know.

MR. BOGIN: The reverse side of that Household Finance check is being entered into record as Commission

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Exhibit No. 19.

(Whereupon, Commission Exhibit No. 19 was marked for identification.)

MR. PONDER: Let's go off the record a minute.

(There was a discussion held off the record.)

Q I have here a document signed or ostensibly signed by David Sanders and Lenore Sanders saying that they contributed $1009.58 to Citizens for LaRouche. The date's illegible but it looks like January 22, 1980. Do you recognize that document?

A I'll tell you. The only thing I recognize about the document -- which means I probably mailed it, although I didn't get David to sign it -- is this stuff down here, this print.

Q Below the signature lines and the address --

A Correct.

Q -- there is printing saying,"Lenore Sanders, Spouse," and spouse is in parenthesis, "and David Sanders"?

A Correct.

Q And then address?

A 613 St. Ann's Avenue, Baltimore, Maryland. These things right here --

Q That's your handwriting?

A Yeah, that's printed just because I was concerned

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

before I mailed this back, you know, it would be difficult to read.

Q So then you're saying that you mist likely mailed that slip of paper?

A I don't know if I actually mailed it. I know that it probably crossed my hand at one point because I very starkly can recognize my own handwriting.

Q Do you remember if this document was with the previous check that I showed you from Household Finance for $1,000 --

A I don't know but I see it's for the same amount.

Q Would you recognize David Sanders' signature if you saw it?

A Well, I think that's his signature but that's only because I saw the other letter which I think is his signature.

Q But other than that you had no --

A I can barely recognize my husband's signature.

MR. BOGIN: I'd like to put into the record Commission Exhibit No. 20 which is a signature of Lenore and David Sanders saying that they contributed $1,009.58 to Citizens for LaRouche.

(Whereupon, Commission Exhibit No. 20 was marked for identification.)

PERSHAD CO., BAYONNE, N.J. 07002 - FORM 740

Q I have an American Express money order 55-467316467 made out to Citizens for LaRouche in the sum of $25 with the name and signature of David Sanders. I ask if you can identify that American Express money order.

A No, I can't.

Q Do you see where David Sanders has signed his name?

A I see David Sanders printed. I see David Sanders again.

Q Does that look like your handwriting, that David Sanders?

A Definitely not.

Q All right. I ask you to look at Commission Exhibit No. 20 and ask you if you see any similarity between David Sanders' signature in Exhibit 20 and in the money order that I'm showing you now?

A I'm not a handwriting expert but they don't look the same, no.

Q But you didn't sign that David Sanders there?

A I didn't sign either of these.

Q And you don't identify or recognize --

A No.

Q -- this American Express money order?

A No.

Q It hasn't come across your desk? You didn't

PENROD CO., BAYONNE, N.J. 07002 · FORM 740

send it to New York?

A Not that I remember. I mean it might have come across my desk, I don't know.

Q Is it possible that you filled out the payee part, Citizens for LaRouche?

A I don't think so. It just doesn't look like my handwriting at all.

MR. BOGIN: I'd like to enter into the record Commission Exhibit No. 21 which is American Express money order for $25 by David Sanders?

(Whereupon, Commission Exhibit 21 was marked for identification)

Q Do you remember purchasing --

A No, that wasn't purchased --

Q -- that money order which is Commission Exhibit No. 21?

A That wasn't purchased by me.

Q I have in front of me American Express money order 55-466938424, which is payable to Citizens for LaRouche and ostensibly from Ernest K. Pulsifer; and I ask you if you recognize the money order?

A Well, I assume that this is the money order for the $150 I got from Pulsifer. I don't remember if I purchased this money order or not.

Q Do you recognize the handwriting?

REPORTING CO., BAYONNE, N.J. 07002 · FORM 740

A I don't know. You know, I don't know. It could be my handwriting. I don't know -- I can't positively identify it as my handwriting, but I did get some money.

Q Mr. Pulsifer gave you $150?

A Yes.

Q You went out and purchased a money order?

A I don't know whether I purchased it or not. I can't remember whether I purchased it or whether I asked someone in the office to because when he gave us money it was at night so I knew the money order wasn't purchased that night.

Q If either you or somebody, one of the volunteers, purchased the money order, would either you or one of the volunteers that filled out the information on the --

A Yeah, sure.

Q -- money order?

A Yeah.

Q That wouldn't be Mr. Pulsifer's writing then?

A I don't think it is because I have a letter from Pulsifer and I don't think that's his handwriting.

Q Could you show me the letter from Mr. Pulsifer?

A I don't know. Do you have --

MR. PARKER: I'll have to check. It would be one of these letters that says, "I contributed --"

THE WITNESS: Yes. I don't know if they sent

PINGAR CO., BAYONNE, N.J. 07002 - FORM 740

us down a copy of it. I know one exists.

MR. PARKER: No.

THE WITNESS: We don't have it. If you need it, I could get them to send you one from New York.

MR. BOGIN: That would be very helpful. I'd like to put American Express money order --

MR. PARKER: Oh, here it is. I got it right here.

MR. BOGIN: May we have a copy to put into the record?

MR. PARKER: Sure.

MR. BOGIN: I have American Express money order No. 55-466938424 to be Commission Exhibit No. 22.

(Whereupon, Commission Exhibit No. 22 was marked for identification.)

Q On Commission Exhibit No. 22, well, how do you think Pulsifer is spelled in that money order?

A This looks like P-u-l-s-i-f-o-r.

(There was a discussion held off the record.)

Q This document in front of you, it's dated 4-3-80. It's typed saying: "I contributed $150 to Citizens for LaRouche on December 1st, '79. This contribution was from my own personal funds and not drawn on an incorporated account." And there seems to be a signature of Ernest Pulsifer with the address. Do you recognize this document?

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

A I personally don't recognize it.

Q Did you --

A I know we asked Ernest Pulsifer to sign a letter.

Q And you asked him to do it on April 3rd, 1980?

A That's what it says. I think he was probably asked before then.

Q Did you personally go out and have him sign this?

A No.

Q Did your husband?

A I don't know. He might have. He knows Pulsifer.

MR. BOGIN: I'd like to enter this as Commission Exhibit No. 23.

(Whereupon, Commission Exhibit No. 23 was marked for identification.)

Q You've never seen Commission Exhibit No. 23 until when?

A Oh, I don't -- I can't tell you that I've never seen it. I don't know. I mean, I've seen a lot of those letters. I don't know if I've ever seen that letter or not.

Q This was sent down from New York upon your request.

A Yes, sir; yes.

Q When did you receive it?

A I don't know when. I guess right around the time

I gave you all that stuff. I really don't remember.

Q On Exhibit No. 23 it says that the contribution was made on the 1st of December and the money order says that it was the 4th. Can you explain that?

A It's possible that the money order wasn't purchased until a couple of days afterwards.

Q That he gave you the money first and then it was a couple of days afterwards --

A As a matter of fact, I bet if you look on the calendar -- December 1st, I thought it was a weekend -- December 1st of '79 was a Saturday.

MR. PARKER: Well, the thing says on or about 12-1-79, anyway.

THE WITNESS: It's possible he gave me the money on a Saturday and, you know -- I don't know.

MR. PARKER: The letter says on or about 12-1-79.

Q Do you know who might have the original of this document?

A I'm sure New York would have it.

Q I have in front of me Citizens for LaRouche contributor information and another American Express money order, 55466938411, to Citizens for LaRouche from Ann Taylor. I ask if you recognize these two documents on that sheet?

A No, I don't. I recognize this. It's got my initials on it.

PLIMSOL CO., BAYONNE, N.J. 07002 - FORM 740

Q Does that mean that you filled out that top part?

A Probably, yes.

Q And did you purchase a money order from Ms. Taylor?

A I don't think so.

Q Is that your handwriting on the money order?

A I don't think it is. I slant that way. I don't think that is my handwriting.

Q Do you happen to have a letter in your files that says that she made this contribution?

MR. PARKER: We don't have anything relative to Ann Taylor to the best of my knowledge.

A I don't actually know her -- most of these other I actually have met at least on one occasion.

Q Right, but it says CFL rep. and that's DHF, that stands for -- that's your initials.

A All that that means is that I'm the guy who filled out this slip.

Q And where did you get the information for this slip?

A I don't remember. It might have just gotten scribbled on this envelope, whatever. I don't know.

Q You don't remember filling out the American Express money order?

A No, I don't recall filling out that one.

Q Or purchasing it?

PHENIX CO., BAYONNE, N.J. 07002 - FORM 740

A No.

MR. BOGIN: Okay. I'd like to enter the Citizens for LaRouche information in the American Express money order by Ann Taylor into the record as Commission Exhibit No. 24.

(Whereupon, Commission Exhibit 24 was marked for identification.)

Q I have an American Express money order, 55-466938402 to Citizens for LaRouche from Charles Clark. I ask if you recognize that document.

A Yes, I do.

Q Did you purchase the money order?

A Yes.

Q Is that your handwriting?

A Probably.

Q Did you write Charles Clark, sign it as Charles Clark?

A Probably.

Q Did you ever get another document, separate document, with his correct signature?

A I believe so, yeah.

Q Do you happen to have it with you in your files?

A Do you have it with you in your files?

MR. BOGIN: Could we make a copy of that file?

MR. PARKER: Sure.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. BOGIN: As an exhibit?

MR. PARKER: Do you have any others, I mean --

MR. BOGIN: Nancy Radcliffe?

MR. PARKER: Yes, we got Nancy Radcliffe.

(There was a discussion held off the record.)

MR. BOGIN: American Express money order to Citizens for LaRouche for $70 by Charles Clark should be entered in as Commission Exhibit No. 25.

(Whereupon, Commission Exhibit No. 25 was marked for identification.)

Q I have in front of me, Travelers Express money order 29-26722, Citizens for LaRouche, for $250, signed with the signature -- looks to be Nancy Radcliffe, and I ask if you recognize that --

A Yes.

Q -- money order?

A I recognize it, I purchased it and I filled it out.

Q So where it's signed Nancy Radcliffe, that's really your signature?

A Right.

MR. BOGIN: Okay. I would like to enter Traveler's Express money order for Nancy Radvliffe into the record as Commission Exhibit No. 26.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

(Whereupon Commission Exhibit No. 26 was marked for identification.)

Q I have in front of me Contributor information signed by the contributor, Charles Clark, saying he contributed $70 for Citizens for LaRouche on November 10, 1979. It's dated February 21st, 1980. I ask --

MR. CLARK: It says on or about, doesn't it?

MR. BOGIN: It's illegible but I assume that's what it says, on or about.

Q I ask if you can identify that document?

A I mailed this to New York, although I didn't get Charles' signature on it.

Q And do you remember when New York requested the document?

A No, I don't.

Q But you did get a phone call sometime subsequent to when you received the money order from New York saying that they don't have the documentation?

A Yes.

Q And they called you and they said, "Please get it?"

A Correct.

MR. BOGIN: Enter the contributor information from Charles Clark for Exhibit No. 27.

PEGASO CO., BAYONNE, N.J. 07002 - FORM 740

(Whereupon, Commission Exhibit 27 was marked for identification.)

Q I have in front of me another contributor information. This time from Nancy Radcliffe dated 2-28-80, of a $250 contributions to Citizens for LaRouche on or about September 10, 1979. Do you recognize that document?

A Yeah, I recognize it.

Q Did you fill out any of the information on that document?

A I don't think so.

Q Did you give it to Nancy Radcliffe to sign?

A Yeah, I remember this one specifically because she was in New Hampshire for two months campaigning. We had trouble getting in touch with her. She didn't sign it until she came back to Baltimore.

Q And did you hand it to her to sign?

A Yes.

Q Okay, and as far as you know, is that her address, 3215 North Charles Street?

A That's not her address any more. It used to be.

Q Now she lives --

A I told you she lives --

Q East 31st?

A 31st. I don't know where it's -- I mean I know where it is but I don't know the number.

PENSAU CO., BAYONNE, N.J. 07002 - FORM 740

MR. BOGIN: I'd like to mark Contributor Information signed --

MR. PARKER: Between Calvert and Guilford, right?

THE WITNESS: Yeah.

MR. BOGIN: -- signed by Nancy Radcliffe, as Commission Exhibit No. 28.

(Whereupon, Commission Exhibit 28 was marked for identification.)

Q Commission Exhibit 26, did you purchase this money order for Nancy Radcliffe?

A Yeah, I said I did.

Q And, okay, do you realize that Nancy Radcliffe spells her name with an "e" at the end? Okay.

MR. PARKER: Does she?

THE WITNESS: I don't know if she does or she doesn't. I mean, but -- that's my handwriting. I'm not --

Q With the $250 money order for Nancy Radcliffe, did she give you cash?

A Yeah, she did.

Q Has she made other contributions to your knowledge?

A Yes.

Q Have they been by personal check?

A Some by check, some by her own personal check. I know she's made contributions on a joint account that she has.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Do you recall any reason why she contributed a money order in this instance?

A I don't know if she had a checking account at that time, but you'd have to ask her why she had cash. I don't know.

Q No. That's fine, just what your knowledge is. And she handed you the $250?

A Um-hum.

Q At some time prior to your going out and purchasing the check?

A Correct.

Q And you didn't ask her to give you the contributor information at that time when you got the $250 from her?

A I don't think I did at that time because I see her every day. I probably, you know, just figured we'd get it another time.

Q But then she left?

A She was in New Hampshire for a couple months.

Q January and February?

A Those were the big campaign months.

Q The money order was purchased on or about the 10th of September, so I was wondering why you couldn't get the information in September, October, November or December?

A I'll tell you. I mentioned before -- and I don't

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

know whether she signed the letter early or not -- very often somebody does sign a letter and it's sent to New York and New York then calls us up and tells us they don't have the letter and they need the letter. So, I don't, you know, I honestly don't know. Nancy may have signed one earlier and this may be the second time she ever signed one. I just, I just don't know.

Q Is it your normal practice when you get a money order or a check to staple the contributor information with the signature where it's needed and information with the written instrument?

A We try to. We try to.

Q I have money orders here to Citizens for LaRouche from Steven Warm for $100 with his signature saying that he made the contribution. Do you recognize the money order?

A I actually recognize the letter. I don't recognize the money order.

Q You didn't purchase the money order?

A I don't think so. I don't know, really.

Q I have a Federal Express money order from Belinda F. deGrazia, Citizens for LaRouche and accompanying documentation. Do you recognize one or the other?

A Again, I recognize the letter. I am just not sure about these money orders to be perfectly honest.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q It's not your handwriting on the money orders?

A I don't think so.

Q You didn't purchase the money orders?

A I don't remember purchasing them, but I do remember the letters.

Q How do you remember it? What could you remember on them?

A Well, I remember -- you see, Belinda and Steve both worked for my campaigns.

Q Steve deGrazia?

A No, no, Steve Warm.

Q Oh.

A They both worked for my campaign.

He was my treasurer; she was my campaign Chairman. So I recognize their signatures and I know their handwriting very well because we signed a lot of documents together. I recognize the letters but --

Q Oh, you recognize it as being their signatures?

A Yes.

Q But do you remember --

A Ever seeing the letter?

Q -- asking them to --

A No.

Q -- buy the money orders or supplying them with --

A No. All that stuff I don't recall.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yeah.

Q But you purchased the money order --

A Yes, I did.

Q -- and filled out the information on this money order?

A Yes, I did.

MR. BOGIN: I'd like to enter American Express money order 55-466938409 into the record as Commission Exhibit No. -- little help, 29?

MR. PARKER: 29. Is that Chandi?

MR. BOGIN: That's Chandi.

(Whereupon, Commission Exhibit 29 was marked for identification.

Q And I have here Citizens for LaRouche Contributor Information, a Federal Express money order by Constantine Philios. I ask if you recognize either the contributor information card or the money order.

A I think I recognized this, the contributor information card.

Q Why is that?

A I think I may have filled this out.

Q That's your handwriting on the contributor card?

A You know, I'm not absolutely positive.

Q But to the best of your knowledge?

A The thing that actually attracts my attention is

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Somebody else --

A It could have been. It also could have been me. I just don't remember and I don't want to tell you for certain if I'm not sure.

Q An American Express money order to Citizens for LaRouche from Pustom Chandi. Do you recognize the money order?

A Yes, I do recognize that and that is my handwriting.

Q That's your handwriting?

A Yeah.

Q And was there accompanying documentation sent to New York with that money order?

A Yeah, as a matter of fact I think on that one the letter was signed simultaneously.

Q Do you happen to have it in your file?

A I don't think we have that one because he's not one of the people named. I only asked them for copies of the people who are named in the initial -- I only asked New York for copies of the individuals who are named in the initial stuff that you sent me.

Q But as far as you can recollect --

A There is a letter.

Q He signed a letter at about the same time --

A Yes.

Q -- that he made the contribution?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yeah.

Q But you purchased the money order --

A Yes, I did.

Q -- and filled out the information on this money order?

A Yes, I did.

MR. BOGIN: I'd like to enter American Express money order 55-466938409 into the record as Commission Exhibit No. -- little help, 29?

MR. PARKER: 29. Is that Chandi?

MR. BOGIN: That's Chandi.

(Whereupon, Commission Exhibit 29 was marked for identification.

Q And I have here Citizens for LaRouche Contributor Information, a Federal Express money order by Constantine Philios. I ask if you recognize either the contributor information card or the money order.

A I think I recognized this, the contributor information card.

Q Why is that?

A I think I may have filled this out.

Q That's your handwriting on the contributor card?

A You know, I'm not absolutely positive.

Q But to the best of your knowledge?

A The thing that actually attracts my attention is

PENGAD CO., BAYONNE, N.J. 07002 1-800-631-6989

this. Iconcographer business.

Q For occupation?

A Yeah, because of a member getting money from someone who had a profession which struck me -- I never met anyone who did -- I don't even know really what it is, but I think I recognize this. I don't recognize that.

Q Did you purchase the money order for him?

A No, I don't think I did.

Q And that's not your handwriting or your money order?

A I don't think so. That's definitely not me.

Q Well, Citizens for LaRouche, where it says Citizens for LaRouche?

A Could be, but I honestly don't recognize it. I know I didn't purchase a money order.

MR. BOGIN: Okay. I would like to enter this as Commission Exhibit No. 29, which is --

MR. PARKER: 30.

MR. BOGIN: -- 30, which is Citizens for LaRouche information card and Federal Express money order 119691496.

(Whereupon, Commission Exhibit No. 30 was marked for identification.)

Q I have a personal money order from Equitable Trust Bank made out to Citizens for LaRouche. I can't read

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

the signature. Can you make that out?

A Sam --

MR. PARKER: Well, you can't do it.

THE WITNESS: No, I'm sorry, I can't make it out.

Q Do you recognize this written instrument --

A No, I don't.

Q -- in any fashion?

Do you know a Berthemos?

A No, I don't.

Q Do you know anybody by the name of Somes? First name.

A No.

Q Do you know anybody who lives on 514 South Oldham Street?

A I know where Oldham Street is. I don't know who lives there.

Q But you don't recognize that personal money order?

A No, I don't.

MR. BOGIN: I would like to enter this personal money order from the Equitable Trust Bank 1322084086 as Commission Exhibit No. 31.

(Whereupon, Commissioner Exhibi
31 was marked for identificati

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q We went over these documents before. At the time I didn't mark them. They're Federal Express money order No. 119851803 from Belinda deGrazia, which I'd like to put in as Commission Exhibit No. 32, and Federal Express money order 119851804 and contributor information for Steven D. Warm, as Commission Exhibit 33.

(Whereupon, Commission Exhibits Nos. 32 and 33 were marked for identification.)

Q When Felice sent instructions down to you, did she use your home address?

A I've gotten stuff from Felice at home. I've gotten a personal visit.

Q Can she send it to you other than at home, any mail?

A She sends to me as a member of different places. I have two different work addresses.

Q Do you remember receiving instructions on how to fill out this contributor information at your home?

A Written instructions?

Q Right.

A Let me think for a second. I really don't remember.

Q You received instructions from New York on how to fill contributor information out.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I think so, yes.

Q Well, you have or you haven't?

A Well, I've gotten verbal instructions and written instructions. Now, I don't know exactly what's been verbal, what's been written.

Q And you've given instructions to other volunteers on how to fill out the contributo information?

A On occasion.

Q Do you remember who you gave these instructions to?

A I've talked to Nancy Radcliffe about it. I've talked to Belinda deGrazia about it. I've talked to my husband about it. If there's any questions, I usually -- since I'm not an expert on this -- I just call Felice.

Q You said that you met Mr. Pulsifer at a hotel, Belvedere?

A Yeah, the hotel Belvedere, the Owl Bar.

Q And he gave you $150 at that time, a contribution?

A Yes.

Q Has he given you contributions any other time?

A I don't think so. He came to a fund raiser on December 9th, but I don't think he gave us any money. He certainly didn't give me any.

Q At the time he gave you the $150, you didn't ask him for the information, contributor information?

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

A No. I just asked him if I could get a money order for the thing. First I asked him for a check. He didn't have any. So, I said, "Is it okay if we get a money order and he'll sign a letter stating that he gave his money?" And he said, "Sure, no problem."

Q Did you send him anything for his giving you a contribution?

A No.

Q Did you ever send any of your contributors New Solidary Newspaper?

A I might have sent them clippings if they asked for them.

Q The book, Dope, Inc?

A No, I've never sent that.

Q Any books written by Linden LaRouche?

A Oh, yeah, on occasion.

Q To people who made contributions?

A Yeah, the books aren't sent to people in return. In other words, we don't sell them the books. I mean there are times that you know, if somebody has given me $100 contribution and they said they'd like to see a copy of Mr. LaRouche's book, I'm not going to say, give me three bucks. You know, I'll take a copy of the book and send it to them.

Q So at the time that he gave you the money you didn't

DENSAB CO., BAYONNE, N.J. 07002 - FORM 740

get his signature and the contributor --

A No, I didn't, at the time he gave his money.

Q And did you ever go get it subsequently?

A I know that we tried to get in touch with him. We asked him for it and I am almost sure but not positive that he did sign a letter for my husband, but, you know, I don't remember. I know we have a copy.

Q But you have no personal knowledge that he signed it?

A No. I mean I didn't see him sign it, for instance. Okay?

MR. BOGIN: What were you going to say?

MR. PARKER: I was just going to say that we're not going to waive signing the deposition. So if you'll notify me when it's ready.

MR. PONDER: Well, wait. Our understanding when we began this morning was that Ms. Freeman would give initial samples of the various things that we had to fill out but that she would then give the requisite number per item.

MR. PARKER: No, I'm talking about the deposition transcript.

MR. BOGIN: The waiving of the signature.

MR. PONDER: I understand, but I can't tell whether you think the deposition is over now or not.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: Yes, I do think it's over.

MR. PONDER: Because you had said that you wanted to get this part done so that you could leave but that she could stay on and give us the number.

MR. PARKER: If you go back and read what I said, I said that we would let you know at the end of the deposition whether Mrs. Freeman had any objection to signing four additional copies of each one of the handwriting exemplars.

Mrs. Freeman feels that it's an impingement on her personal well-being to sign all those things. She's already signed ten, I think it is, exemplars which is more than enough for anybody, in our opinion, and she chooses not to sign any more.

MR. BOGIN: Now, at the time, we explained that we need --

MR. PARKER: I sincerely believe, a legal purpose that as I read the law, there's no right to even require a handwriting exemplar. There are certain criminal statutes which make that necessary, but certainly they are not included in Section 473-D of the Act.

MR. BOGIN: 437D?

MR. PARKER: 437D.

MR. PONDER: Are you saying that you want to go to Court to test this? I mean we --

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: We dont' want to go to Court with anybody. This thing is a terrible imposition on Mrs. Freeman. Her word is outrageous. It's extremely expensive and if you think that you can get a District Court Judge in the State of Maryland to require her to sign five copies of those ten items, then you're welcome to it and we'll take that up --

MR. PONDER: Well, we think we can. It's easier for you to go ahead and give the samples that we've explained we need now than for us to go fight over this.

MR. PARKER: If you think it will be an interesting test then we'll see if the Commission and others feel that that's the type of thing that ought to be engaged in.

I mean I don't think it's part of the law.

Now, we voluntarily gave you ten without objecting to it and you have them.

In any event, Mrs. Freeman will not waive signing the deposition and when the transcript is ready, if you'll call us, we'll make arrangements to read and sign it.

MR. BOGIN: For the record, I'd like to state that it was the understanding of the Federal Election Commission that they would take the handwriting samples of Debra Manania Freeman after asking the questions in order not to waste her attorney's valuable time at the deposition.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

that it was our understanding then at that time that Ms. Freeman would cooperate and write out copies of all the samples that she's already written so that we'd have a total of five. And it was explained at that time that in order to have a viable sample we needed five of each sample that we requested.

In addition, counsel has now stated for the record that he doesn't think as a matter of law that it's required that the samples be taken and that it's our understanding that he refuses to have Mrs. Freeman sign these documents.

I'd like to ask Mrs. Freeman, do you refuse to sign any further handwriting samples?

MR. PARKER: You don't have to answer that question.

THE WITNESS: I choose not to answer it.

MR. BOGIN: On the advice of counsel, Ms. Freeman has chosen not to answer. We will take that to mean that she refuses to sign any further documents and our only recourse now is to enforce this aspect of the subpoena asking for the handwriting samples in the District Court.

MR. PARKER: Fine. It's all on the record. Just make sure that we get a chance to sign the deposition before you release it.

(Whereupon, the deposition was concluded.)

Debra Manaria Freeman (Deponent)

PENNSAD CO., BAYONNE, N.J. 07002 - FORM 740

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Susan D. Ashe, a Notary Public in and for the State of Maryland, County of Anne Arundel, do hereby certify that the within named, DEBRA HANANIA FREEMAN, personally appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulation contained herein was entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

As Witness, my hand and Notarial Seal, this ____day of August, 1980, at Baltimore, Maryland.

_____
Notary Public

PENCAD CO., BAYONNE, N.J. 07002 - FORM 749

Commission Ex. No. 13
July 30, 1980
SDA

ATTACHMENT #5
page 2

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

7-16
520

Pay to the order of [illegible] $ 15.00

[illegible] Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

997

7-16
520

Pay to the order of $

Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo

Commission Ex No 12
July 30, 1982
SDA

ATTACHMENT #5
page 1

DR. DEBRA J. HANANIA
14004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 19 77

7-16
520

Pay to the order of Citizens Savings Bank $ 50.00

Fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo Rent

Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO 999

7-16
520

4 Dec 19 77

Pay to the order of Citizens Savings Bank $ 40.00

Forty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

Commission Ex No. 19
July 30 1980
SDA

ATTACHMENT #1
page 2

Pay to the order of Citizens for LaRouche

Dated 1/23/10

CITIZENS FOR LaROUCHE
CITIBANK

Code 1-3

Commission Ex. No. 18
July 30, 1980
SDA

ATTACHMENT #1
Page 1

Date 1/23/80 Code 1-3 5-02

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

CK NO.	DATE	ACCOUNT	AMOUNT
75	01/22/30.		$*1,009.58 ← PAY

DAVID SANDERS

BALTIMORE, MARYLAND NO. 4
NOT VALID FOR MORE THAN $10,000.00

L. A. Wall

Commission & No. 33
July 30, 1980
SDA

DATE _____ DEPOSIT CODE _____

ATTACHMENT #5, page 5

FEDERAL EXPRESS MONEY ORDER

119851804 64-79/611

PAY THE SUM OF 50-008 $100.00

PAYABLE TO Citizens For LaRouche
MAIL NOTICE ON BACK

NOT VALID OVER $500.00

FROM Steven C. Warren
PURCHASER'S SIGNATURE

PRESIDENT

ADDRESS 310 Ridgemede Rd.

FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

:061100790: 119851804" 74

DATE 1-23-80 DEPOSIT CODE 1-2

JANUARY 22 1980
(date)

I contributed $100.00 to Citizens for Larouche on

JANUARY 22 1980.
(date)

signed

Steven E Warren
(signature)

DATE _____ DEPOSIT CODE _____

310 RIDGEMEDE ROAD
(address)

BALTIMORE MARYLAND

DATE _____ DEPOSIT CODE _____

Commission Ex. No. 32
July 30, 1980
SDR

ATTACHMENT #5, page 6

FEDERAL EXPRESS MONEY ORDER

119851803 64-79/611

PAY THE SUM OF 50-008 400.00

PAYABLE TO Citizens for LaRouche — NOT VALID OVER $500.00

FROM Belinda F deGrazia — PRESIDENT

ADDRESS 310 Ridgemede Rd — FEDERAL EXPRESS SERVICES CORP. DRAWER-DRAWEE

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

:061100790: 119851803" 74

Sample 5.03

DATE 1-23-80 DEPOSIT CODE 1-2

January 22 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22 1980.
(date)

signed

B. F. deGrazia

DATE _____ DEPOSIT CODE _____

310 Ridgemede Road
(address)

Baltimore Maryland 2

ATTACHMENT #5

page 10

ission Ex No. 31
30,1980

DATE 1-15-80 DEPOSIT CODE 1-2

Personal Money Order
Equitable Trust Bank
EQUITABLE TRUST COMPANY
SELLING AGENT FOR
Travelers Express Company, Inc.
SUBJECT TO CONTRACT REFERRED TO ON REVERSE

132 2084086

DATE 1/15/80

PAY TO THE ORDER OF Charles S. LaPorte

(X) Donald R. Hunter 514 S Old Mill Rd Dallas Tx

PURCHASER SIGNER FOR DRAWER

AMOUNT DO NOT PAY OVER FIVE HUNDRED UNITED STATES DOLLARS

TWO HUNDRED FIFTY AND 00/100 DOLLARS $ ****250.00*

:091900533:132 2084086 2" 90

DATE 1-15-80 DEPOSIT CODE 1-2

Commission Ex. No. 30
July 30, 1980
SDA

ATTACHMENT #5
Page 11

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Constantine Philios
Address Sweet Air Rd.
City Baldwin State Md Zip
Amt. of contribution $ 225
(If contribution is $100 or more fill out below)
Occupation iconographer.
Place of employment see above.
Address

DATE 1-21-80 DEPOSIT CODE 1-1

FEDERAL EXPRESS MONEY ORDER
119691496 64-79/611

PAY THE SUM OF 50 082 FEDERAL EXPRESS 225 DOLS 00 CTS

PAYABLE TO Citizens for LaRouche NOT VALID OVER $500.00

FROM Christine Philios - Constantin Philios PRESIDENT
PURCHASER'S SIGNATURE

ADDRESS Sweet Air Rd. FEDERAL EXPRESS SERVICES CORP. DRAWER - DRAWEE

CITY Baldwin STATE Md. ZIP CODE DATE

:061100790: 119691496# 74

DATE 1-21-80 DEPOSIT CODE 1-1

Commission Ex. No. 29
July 30, 1980
SDA

ATTACHMENT #5
page 9

AMERICAN EXPRESS MONEY ORDER 23-1 1020

11/21 55-466,938,409

PAY THE SUM OF
NOT GOOD OVER $200

DATE 9/17 19 THE SUM 45 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Eagleton-Hart

James D. Robinson
CHAIRMAN

Paul Charlie - 4 Jones Rd Bethany Conn 21221
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

AMERICAN EXPRESS COMPANY ISSUER

⑈1020⑈ 000⑆55 ⑆669384095⑈

Commission Ex. No. 28
July 30, 1980
SDA

2 28 80
(date)

I contributed $ 250.00 (amount) to Citizens for LaRouche on

9/10/79 (date). This contribution was from my own personal

funds and not drawn on an incorporated account.

signed

Nancy D Radcliffe
(signature)

3215 W Charles St. Apt-216
(address)

Boise Id 83715
(City) (State)

NANCY RADCLIFFE

Commission Ex. No. 27
July 30, 1980
SDA

2/1/80
(date)

I contributed $ 70.00 to Citizens for LaRouche on
(amount)

11/16/79. This contribution was from my own personal
(date)

funds and not drawn on an incorporated account.

signed

Charles Edsel
(signature)

[redacted]
(address)

[redacted]
(City) (State)

Commission Ex No. 24
July 30, 1980
SDA

ATTACHMENT #2
page 1

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 $250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARIBAULT

Nancy Robitaille
PURCHASER, SIGNER FOR DRAWER

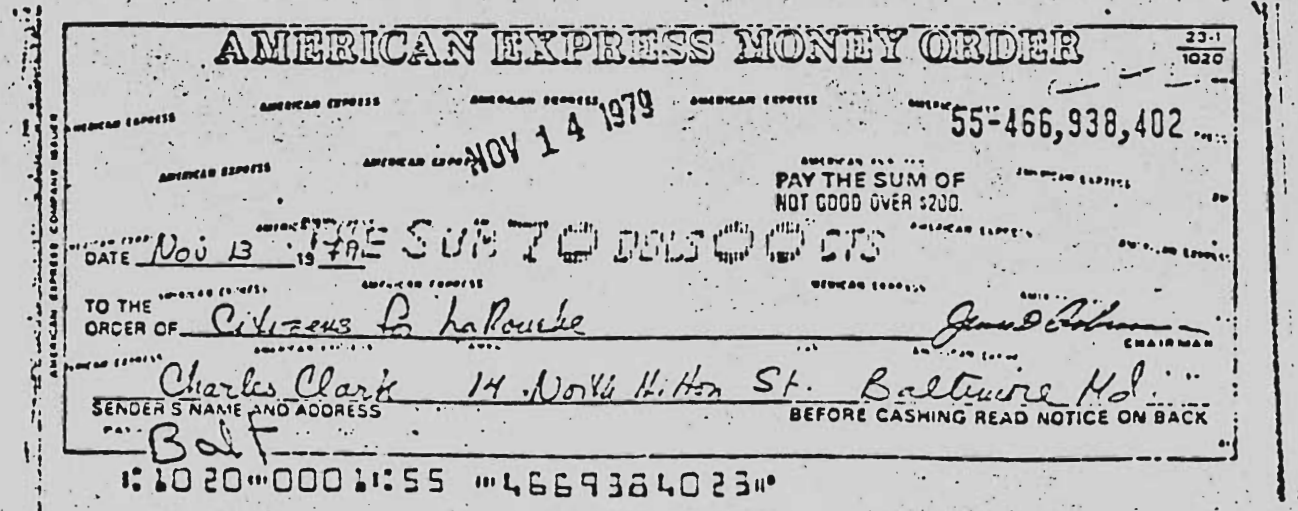
3215 N Charles Balto 21218
PURCHASER'S ADDRESS

:091900533: 89 2926722" 90

ATTACHMENT #5

page 4

Commission Ex. No. 25
July 30, 1980
SDA



AMERICAN EXPRESS MONEY ORDER

23-1
1020

55-466,938,402

NOV 14 1979

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 13 19 78 FIVE SUR TO DOLLARS AND CTS

TO THE ORDER OF Citizens to La Rouche

Charles Clark 14 North Hilton St. Baltimore Md.
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Balt

⑆1020⑆000⑆55⑈4669384023⑈

Commission Ex. 89-24
July 30, 1980
SDA

ATTACHMENT #5
page 3

3

CITIZENS FOR BARUCCHI
P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

150

Name of contributor Anne G Taylor
Address 1304 Park St
City Balt State Md Zip
Amt. of contribution 150.—
Contributor's occupation retired
Place of employment
Address
CFL Representative DHF/KSH

Taylor 7/23/80 01

AMERICAN EXPRESS MONEY ORDER 23-1/1020

55-466,332,411 V

11126

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 7/23 1980 ONE HUNDRED FIFTY DOLLARS

TO THE ORDER OF Citizens for Barucchi

John B. Adams CHAIRMAN

Anne G Taylor 1304 Park St Balt Md

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000①:55: ⑈4669384①3⑈

V

25

Commission Ex. No. 23
July 30, 1980
SDA

4/3/80
(date)

I contributed $ 150 — to Citizens for LaRouche on
(amount)

12/1/79. This contribution was from my own personal
(date)

funds and not drawn on an incorporated account.

signed

(signature)

(address)

(City) (State)

Commission Ex. No. 22
July 30, 1980
SDA

ATTACHMENT #5
page 7

Pulsifer 6
7/23/80

12-4-79, 1-1

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-466,938,424

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 12-4-79 THE SUM OF 150 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Ivan Rowles

James B. Adams
CHAIRMAN

SENDER'S NAME AND ADDRESS Robert K. Pulsifer
Baltimore

BEFORE CASHING READ NOTICE ON BACK

1:0 20 "000 61:55 "4669384 248"

Commission Ex No. 17
July 30, 1980
SDA

2-23-80
(date)

I contributed $ 45.00 to Citizens for LaRouche on

1-25-77.

(name)

613 St. Annes Ave.
(address)

Balto, Md. 21218

If contribution is over $100

Lab Technician
(occupation)

State of Maryland
(place of employment)

State Office Bldg Preston St
(address)

Balto Md 21201

Commission Ex. No. 16
July 30 1980
SDA

ATTACHMENT #1
page 5

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

Commission Ex. No. 15
July 30, 1980
SDA

ATTACHMENT #1
page 4

FEDERAL EXPRESS MONEY ORDER

113833058 4

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens Sv Inlsrnce

NOT VALID OVER $500.00

FROM David Sanders

PRESIDENT

FEDERAL EXPRESS SERVICES CORP.
AN NDC COMPANY
DRAWER-DRAWEE

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

:061100790: 113833058 74

Commission Ex. No. 14
July 30, 1980
SDA

ATTACHMENT #3
page 1

DATE 1-15-80 DEPOSIT CODE 1-2

Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.

DATE Jan 12 1980

PAY TO THE ORDER OF Citizens for Salisbury

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

$140.00

3857 7 5 2 1 0 0 0

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FAIRBAULT

John Salisbury 1909 N Forest Pk Ave

PURCHASER, SIGNER FOR DRAWER PURCHASER'S ADDRESS

⑆091900533⑆ 189 2957627⑈ 90

DATE 1-15-80 DEPOSIT CODE 1-2

Commission Ck 164
July 30, 1980
SDA

SAMPLE I(a)

January 23, 1980
(date)

I contributed $ 250.00 , to Citizens for Larouche on

January 15, 1980 .
(date)

signed

Harold H Harrison M.D.
(signature)

3900 North Charles Street.
(address)

Baltimore Md.
(City) (state)

Commission Ex. No. 10
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens Co Lafourche.

SENDER Ernest Publicker.

SENDERS ADDRESS Baltimore Maryland.

PAY THE SUM OF

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

_____ DATE

Ernest Publicker. AUTHORIZED SIGNATURE

_____ NO.

Writer's Initials _____ Date _____

July 30, 1980 Sample II
SDA

ENDORSEMENT AND ADDRESS

Mary Conaway.

Steven Dawn

Belinda J. DeGrazia

Robert A. Robinson.

Edward St. John.

Ruston Ghandi

Arthur Murphy

Constantin Philiso
Philos

Writer's Initials _____ Date _____

Commission Ex No. 8
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens Co Lafourche

SENDER David Sanders.

SENDERS ADDRESS _____

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

7-30-80 DATE

David Sanders AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

Commission Ex No. 9
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens Co Lafourche

SENDER Charles Clark

SENDERS ADDRESS 14 N. Hilton Street Baltimore Md.

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

_____ DATE

Charles Clark. AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

Commission Ex No. 5
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for McKenzie

SENDER Ann R. Taylor

SENDERS ADDRESS 1304 John Street Baltimore Md.

PAY THE SUM OF

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

7/30/80 Ann R. Taylor _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

Commission Ex No. 6
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for McKenzie

SENDER Nancy Radcliffe

SENDERS ADDRESS 3215 North Charles Street Balto. 21215

PAY THE SUM OF

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

January 12, 1979 Nancy Radcliffe _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

Commission Ex. No7
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for LaRouche

SENDER Kevin Salisbury

SENDERS ADDRESS 1909 North Forest Park Avenue Baltimore Md.

PAY THE SUM OF

DO NOT PAY OVER $100.00

DOLLARS	CENTS

DOLLARS

Jan 12, 1979 DATE

Kevin Salisbury AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

~~Treasurer's Report~~ Commission Ex. No. 1
July 30, 1980
SDA

CHECK SAMPLE

FIRST NATIONAL BANK — August 6 19 77

BRANCH AND CITY

PAY TO THE ORDER OF Citizens for LaRouche $ 400.00

Four hundred dollars DOLLARS

Debra Hanania Freeman

ADDRESS 4004 Hinkwood Rd. Balto Md. TELEPHONE NUMBER 301-243-0199

Writer's Initials Date

Commission Ex. No. 2.
July 30, 1980
SDA

CHECK SAMPLE

FIRST NATIONAL BANK — November 21 19 79

BRANCH AND CITY

PAY TO THE ORDER OF Citizens for LaRouche $ 15.00

Fifteen dollars DOLLARS

Debra Hanania Freeman

ADDRESS 4004 Hinkwood Rd. Balto 21210 TELEPHONE NUMBER 301-243-0199

Writer's Initials Date

Commission Ex. No. 3.
July 30, 1980
SDR

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

_____
BRANCH AND CITY

PAY TO THE ORDER OF Citizens for h. Rourke. $ 45.00

Forty Five dollars DOLLARS

Debra S. Honor

ADDRESS 4004 hickwood Rd Balto 21210 TELEPHONE NUMBER 301 243 0189

Writer's Initials _____ Date _____

Commission Ex. No. 21
July 30, 1980
SDA

ATTACHMENT #1
page 6

DATE 1/4/80 DEPOSIT CODE 1-1

A#1. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1/1020

55-467,316,467

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 74 SUM 25 DOLS 00 CTS

TO THE Point Fm. LaRuche

David Sanders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders

⑈1020⑈000⑆55 ⑈467316467⑆⑈

Commission Ex No. 20
JULY 30, 1980
SDA

ATTACHMENT #1
page 3

January 22, 1980
(date)

I contributed $1,029.58 to Citizens for Larouche on

(date)

signed

(signature)

(address)

(City) (state)

Maure Sanders (spouse) David Sanders

Baltimore Md.

221 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

RECEIVED
SEP-2'80
80 SEP 4

Federal Election Commission
Office of General Counsel
1325 K St., N.W.
Washington, D. C. 20463
Attn: Mr. Robert Bogin

Cc# 8695

TELEPHONE 837-3027

SERVICING ALL OF MARYLAND

GORE BROTHERS REPORTING COMPANY

(ASSOCIATED WITH TOWSON REPORTING COMPANY)

225 E. REDWOOD STREET

BALTIMORE, MARYLAND 21202

DATE

TO

RE:

NOTE: MAKE CHECKS PAYABLE TO GORE BROS.

PLEASE RETURN BLUE COPY WITH REMITTANCE
PAYMENT DUE WITHIN 30 DAYS

for the deposition taken on June 4th, 1982
in the above-entitled matter.
Deposition of Steven G. - 44 pages.
Deposition of Steven G. - 75 pages.
Deposition of Belinda Delvaris - 23 pages.
Deposition of Belinda Delvaris - 23 pages.
Deposition of Steven Gans - 108 pages.

Original and 1 copy

Reporter:
Larry St Ives

PAGES	
READING & SIGNING	
APPEARANCE	
XEROXING	
POSTAGE	3.45
TOTAL	$520.75

No. 18179

TAXPAYER'S IDENTIFICATION
NO. 52-0545511

GORE BROTHERS REPORTING COMPANY
225 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

Federal Election Commission
1325 K St. N. W.
Washington , D.C. 20463
Attn: Marsha Gentner

82 OCT 18 AM 11:50
FEC

BEFORE THE
FEDERAL ELECTION COMMISSION
MUR 1158

* * *

The deposition of STEVEN G. WARM, was taken on Friday, June 4, 1982, commencing at 1:30 o'clock p.m., at the offices of the Federal Election Commission, Federal Building, Baltimore, Maryland, 21201, before Lawrence F. St. Yves, a Notary Public.

* * *

APPEARANCES:

MAYER MORGANROTH, ESQUIRE
On behalf of the Plaintiffs

LAWRENCE M. NOBLE, ESQUIRE
and
MARSHA M. GENTNER, ESQUIRE
and
LOIS LERNER, ESQUIRE
On behalf of the Defendant

REPORTED BY:

Lawrence F. St.Yves

I N D E X

WITNESS	PAGE
Steven G. Warm	
By Ms. Lerner.....	3, 72
By Mr. Morganroth.....	62

DEPOSITION EXHIBITS		PAGE
1	Federal Express money order	16
2	Statement	20
3	Federal Express money order	24
4	Statement	26
5	American Express money order	50
6	Statement	51
7	Federal Express money order	58
8	American Express money order	59
9	American Express money order	59
10	American Express money order	60
11	Traveler's Express money order	61

STIPULATIONS

It is hereby stipulated and agreed by and between counsel for the respective parties that the reading and signing of the deposition by the witness is hereby waived.

* * * *

STEVEN G. WARM,

called for examination by the Federal Election Commission, being first duly sworn to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION BY MS. LERNER

Q State your full name.

A Steven Gary Warm.

Q And your address?

A 116 West University Parkway, Apartment 1018, Baltimore, Maryland, 21210.

Q Are you employed?

A Yes.

Q Where are you employed?

A I am employed with the Johns Hopkins University.

Q How long have you been employed there?

A Well, I was hired there in 1976 and at that time I was working for someone who transferred his entire staff to the University of Maryland and then I was at the University of Maryland for about a year and then went back to Johns Hopkins in May of '79, I think.

Q Okay, now, did you receive a subpoena from the Federal Election Commission to testify in their investigation to possible violations of the election laws?

A If you are referring to that letter, certified letter -- can I refer to things that were discussed earlier?

Q Let me explain this. This particular deposition that we are presently conducting is totally separate from any other deposition that you have testified in, so if you are going to refer to any materials you must refer to them as if it were the first time.

MR. MORGANROTH: I would suggest for brevity and for simplicity if there was a subpoena that was issued that you show him the subpoena and have it marked.

MS. LERNER: Off the record.

(Discussion off the record.)

MS. LERNER: The parties will stipulate that Mr. Warm was subpoenaed by the Federal Election Commission to testify in a Federal Election Commission investigation to possible violations of the election laws.

MR. MORGANROTH: So stipulated.

BY MS. LERNER:

Q Are you represented by counsel here today?

A Yes I am.

Q Could you identify your counsel for the record?

A Mr. Morganroth.

Q Mr. Warm, how did you first learn that the Federal Election Commission was investigating possible violations of the election laws by Citizens for LaRouche and others?

A By a letter that was sent to me.

Q When was that letter sent, do you recall?

A Having looked at the letter a little while ago I think it was June of last year. I'm not sure.

MR. MORGANROTH: I suggest if you want to refresh his memory just show it to him. I believe your question was when it was sent not when it was received, which would be difficult for him to answer except from the letter itself.

BY MS. LERNER:

Q Now, let me rephrase the question.

Can you remember approximately when you first learned about the investigation?

A In the Summer of last year.

MR. MORGANROTH: We would stipulate for the record that he was sent and received and whether he remembers the exact contents or not is beside the point, but he was sent and did receive a subpoena and letter from the Federal Election Commission.

BY MS. LERNER:

Q Have you discussed the investigation with anyone?

A I've spoken to people about it.

Q Who have you spoken with?

A I've spoken primarily with people connected

with the Citizens for LaRouche.

Q Can you be more specific?

A I spoke with John Ascher. I've spoken with Debra Freeman and Nancy Radcliffe.

I've spoken with Barbara Boyd. Those are the main people that I've spoken with since this.

Q Since the time that you received the subpoena and you have spoken with these people, let's take Mr. Ascher first, when did you speak with him, do you recall?

A I spoke with him several times from that period when I received it, but as to which dates I can't recall which dates.

Q What did you discuss with him concerning the investigation?

MR. MORGANROTH: I really don't see the relevance. You can answer it, but I am pretty soon going to put a stop to it. I don't think it bears at all into your questioning of him regarding his contributions as to what his discussions are with other people and I can't see any relevance as to whether or not there is a violation, but you can answer that. What did

you discuss with Mr. Ascher?

THE WITNESS: Well, I discussed that I had received something from the FEC and I wanted to know what I needed to do to respond to that, whether I was to -- whether I actually needed to appear as the letter stated or not. He informed me that there was an attorney who was taking care of these things.

BY MS. LERNER:

Q Other than with your attorney did you discuss the testimony that you would give today with anyone?

A Just that I was to give it.

Q I'm sorry.

A Just that I was to give testimony.

Q Are you familiar with a gentleman by the name of Lyndon LaRouche?

A Yes.

Q How are you familiar with him?

A Well, I've been introduced to him personally.

Q When did you become personally familiar with him?

A I first became familiar with him in either

late 1972 or early 1973.

Q How was that that you became familiar with Mr. LaRouche?

A Well, he was teaching an economics class at the Columbia University in the evening. I don't think he was teaching it as an instructor as a part of the university system, but they were at least -- the National Caucus of Labor Committees was using a room there and I was invited by some friends to attend lectures on what was then called dialectical economics.

Q Are you familiar --

A They were very good lectures.

Q Are you familiar with an organization called Citizens for LaRouche?

A Yes.

Q How did you become familiar with that organization?

A I was one of the people who was involved in its activities.

Q How did you first learn that the organization existed?

A I found out that Lyndon LaRouche was running for president.

Q When was that.

A I believe he announced his candidacy immediately -- I mean right after the end of the '76 campaign he announced his. That's when I first found out he was running for president.

I'm sure I found out about the existence of CFL very quickly after CFL came into existence. As to exactly when I can't tell you when.

Q Can you tell me approximately when that was?

A I can't even tell you approximately because I was involved in raising money for the presidential campaign and I know for awhile the contributions were going to the committee to elect LaRouche from the previous campaign, but at a certain point that committee fund was no longer something to which contributions were given and I think there was an interim fund that was set up while LaRouche was still considered a Labor Party candidate and then he became democratic party candidate and I suppose it was some time around then that

Citizens for LaRouche formed, but I'm not sure of the exact time. That's sort of a tough thing to remember.

Q I'm not asking you for a specific date. Can you give me some sort of time frame?

A It wasn't something that stood out. The formation of Citizens for LaRouche was just as I understood it a way of complying with financial reporting regulations.

Q Would this have been after Mr. LaRouche announced that he was running for president? You referred before that right after 1976, or after the 1976 campaign he announced that he was running for president. Would Citizens for LaRouche have come into existence following that?

A It would have had to.

Q Did you work as a volunteer for Citizens for LaRouche during the 1980 presidential campaign?

A Yes.

Q Do you recall when you started working for them?

A Well, I was working consistently as a campaign organizer going back to I'd say the last week of March, 1973

I was involved with LaRouche campaigns.

So any time from that point on if there was a campaign that LaRouche was running, I guess you could say that I supported it or if not actively at least passively was involved in it at some level.

Q The time period that you were working actively as a volunteer, you started actively as a volunteer starting when and ending when, approximately?

A Late March of 1973 to March or April of 1980.

Q Were you paid for your services at any time during that period?

A No, there may have been expense reimbursements very infrequently because the organization just simply did not have the money to pay organizers.

Q Have you ever given money to the Citizens for LaRouche 1980 campaign?

A Yes.

Q How many times would that be?

MR. MORGANROTH: I would request that if you have records of what he has given that you supply him with them so he can read from them rather than try to

test his memory as to times and amounts. He is entitled to see the records.

MR. NOBLE: I think it's a fair question to ask the witness what he remembers about how many contributions.

MR. MORGANROTH: I think it's fair for me to tell him not to answer unless he is given the particular records. This is not a game or test.

MR. NOBLE: Refreshing the memory is used when the witness testifies that he doesn't remember. He has yet to testify to that.

MR. MORGANROTH: Under the Court rules when you ask somebody to testify about something that's a written instrument, he is entitled to it upon request having that written instrument to testify.

MS. LERNER: I have not asked him whether or not there are any written instruments concerning contributions.

MR. MORGANROTH: You don't have to ask him. There are.

MS. LERNER: I asked him if he made

contributions, given money to Citizens for LaRouche and approximately how many times. That would not necessarily entail a written instrument.

MR. MORGANROTH: He is guessing. Why not give him the written instrument so he can testify as to how many times he actually did rather than approximately? If this isn't a game or a test, let's do it properly.

MS. LERNER: I'm going to ask the question again.

MR. MORGANROTH: I assume you intend to offer those, do you not, into evidence?

MS. LERNER: Let me just ask the question.

MR. MORGANROTH: I am asking a question on the record. Do you intend to offer those into evidence?

MS. LERNER: I intend to ask him about some specific documents.

MR. MORGANROTH: Then I would suggest that you have them marked and give him the documents.

MR. NOBLE: When you take your depositions you can conduct them the way you want.

MR. MORGANROTH: I am instructing him not to answer. He said he made contributions and he is entitled to the instruments that you are going to submit under the Court rules.

MS. LERNER: Are you refusing to answer the question, Mr. Warm?

MR. MORGANROTH: He is refusing to answer the question until such time as you comply with the Court rules and give him the instruments that you have.

MS. LERNER: Mr. Warm, are you refusing to answer the question that I just asked, how many times have you given money to Citizens for LaRouche?

THE WITNESS: On the advice of counsel I will not.

MR. MORGANROTH: Do you remember every time you gave a contribution?

THE WITNESS: No.

MR. MORGANROTH: Then give him the instruments.

MS. LERNER: I would ask the court reporter to mark this as Commission's Exhibit No. 1 for identification, a Federal Express money order in the sum

of $100 dated January 22nd, 1980 made out to Citizens for LaRouche from Steven G. Warm, a copy of that.

(The Federal Express money order referred to above was marked Commission Exhibit No. 1.)

MS. LERNER: I would like you to take a look at that and tell me whether you recognize Commission Exhibit No. 1.

(Discussion off the record.)

MS. LERNER: I would like to note for the record that the witness is conferring with counsel.

MR. MORGANROTH: All right, would you repeat the question?

BY MS. LERNER:

Q Do you recognize Commission Exhibit No. 1? Have you ever seen it before?

A I'm not sure that I recognize this particular money order. I do know that I gave $100 contribution at one time or another.

Q Did you give that $100 contribution by money

order?

A I know I gave at least one by money order.

Q But you don't recognize this as the money order you gave?

A Well, I couldn't swear for sure that this was the particular money order that I gave. It could very well be.

Q Do you recall when you made the $100 money order contribution?

A Well, I made several $100 contributions or contributions in excess of $100. The exact date I'm not sure what the exact dates were. This date could be correct. It's quite possible.

Q If you had made a contribution in excess of $100 by a money order, would that contribution have been by one money order for the total amount or several money orders?

A I don't think I gave more than one money order contribution that I can recall. I may have given more than one.

Q You only recall making one money order

contribution, is that correct?

A Right.

Q But, you do not recognize this money order as the money order that you gave for that contribution, is that what you said?

A Well, I don't believe that I signed this.

Q The question was not whether you signed it. The question was whether you recognize it as having seen it before.

A I'm not sure whether I have or haven't seen this before. I don't remember.

Q When you made money order contributions, who purchased the money order?

A I don't know. I may have purchased the money order at one time. It could have been purchased by someone else.

Q Am I correct in my understanding that you said you have given only one money order contribution that you recall?

A I'm saying whether or not I gave a money order contribution, I know I gave contributions by check.

I think I made a credit card contribution. I don't know the exact amount and the exact number of times and this could very well have been one of them.

Q Okay. Please listen to my question very carefully.

A Yes.

Q Did you ever make a contribution to Citizens for LaRouche by a money order?

A Yes.

Q How many times?

MR. MORGANROTH: He just said he doesn't know how many times. Why don't you show him the instrument then?

MS. LERNER: That is not what he said.

MR. MORGANROTH: That is what he said.

BY MS. LERNER:

Q Did you make more than one money order contribution to Citizens for LaRouche?

A It's possible. I can only remember one.

Q Is this the money order that you contributed on the one occasion that you recall?

A I don't know. It probably is. I don't know.

Q Does it --

A There is nothing particularly noteworthy about this except that it says money order.

Q Is the handwriting that is filled out, the payable to and from your handwriting?

A It doesn't look like my handwriting.

Q Is the Steven G. Warm your signature on that money order?

A I don't believe it is.

Q I hand the court reporter a document which I ask to be marked as Commission Exhibit No. 2 for identification. It is a statement dated January 22nd, 1980 which says, I contributed $100 to Citizens for LaRouche on January 22, 1980, signed Steven G. Warm.

(The statement referred to above was marked as Commission Exhibit No. 2.)

BY MS. LERNER:

Q Do you recognize this document?

A Yes. That's my signature.

Q When did you sign that document?

A January 22nd.

Q What year?

A 1980.

Q Did someone ask you to sign it?

A Probably, I don't think I would have done it unless someone had asked me to sign it.

Q Do you recall the circumstances of your signing it?

A No.

Q What was your understanding concerning why you were asked to sign this?

A Simply that there was a need in order for the campaign to qualify for matching funds that every contribution in some way that individuals made be verified by those individuals.

Q What does the $100 mentioned in Commission Exhibit refer to?

A Well, I suspect that it refers to this money order because I don't think I would have -- I wouldn't have signed something like this for a check because I don't

think it would have been necessary to sign this for a check.

Q What if you had given the contribution in cash?

A Well, I might have signed this for a contribution in cash. That's why I say it's possible that this refers to this. I suspect it does.

I don't think I would have had an extra $100 to give on the exact same date. I mean I might have had conceivably, but chances are very good that this refers to this.

MR. NOBLE: For the record he is saying that Exhibit 2 refers to Exhibit 1.

THE WITNESS: Yes.

BY MS. LERNER:

Q Did you ever make any cash contributions to Citizens for LaRouche?

A Well, I may have. When you say cash contributions to Citizens for LaRouche, you are not including credit card?

Q No, I'm talking about cash money.

A In general I would have tried to have done it in some form of writing so that it would have accounted

for the matching funds. Are you talking about outside or just straight campaign expenditures?

Q Contributions to.

A I doubt if I gave any straight cash contributions. I just don't remember all the money that I gave. You would have to ask me about specific times and so forth.

Q Well, I did ask you about a specific time and you didn't remember that one either.

MR. MORGANROTH: He says Exhibit 1. He doesn't recall purchasing Exhibit No. 1, but he does recall giving $100 at that time and signing an instrument that he gave it. Somebody else could have purchased No. 1, but with the $100 he gave them. To tell the truth it doesn't necessarily have to conform with what you want.

BY MS. LERNER:

Q Is that possible that could have happened that you gave $100 in cash and someone else bought the money order and then you signed Exhibit No. 2?

A Sure.

Q Thank you.

MR. MORGANROTH: That corresponds to the truth as he is testifying to it. He doesn't remember Exhibit No. 1 necessarily.

MS. LERNER: I ask the court reporter to mark this as Exhibit No. 3 for identification, a Federal Express money order made out to Citizens for LaRouche in the amount of $400 and on the signature line has the name Belinda DeGrazia.

(The Federal Express money order referred to above was marked as Commission Exhibit No. 3.)

BY MS. LERNER:

Q Have you ever seen Commission Exhibit No. 3 before?

A I don't know if I've seen this or not. I doubt it.

Q Did you purchase it?

A Did I purchase it?

Q Yes.

A Not that I recall.

Q I ask you now to look back at Commission Exhibit No. 1 which is the Federal Express money order for Citizens for LaRouche with a signature line signed Steven G. Warm and ask you to compare the serial numbers on the two money orders.

A One comes right after the other.

Q They're consecutively numbered, is that correct?

A Yes.

Q But you did not purchase either of these?

A I don't remember purchasing either of these. I don't think I did. I mean when you say purchasing it, I mean go to the bank myself.

Q Did you personally go to the bank to purchase them?

A I don't think I did.

MS. LERNER: I ask the court reporter to mark this as Commission Exhibit No. 4. It is a statement dated January 22nd, 1980 which says, I contributed $400 to Citizens for LaRouche on January 22, 1980 and it is signed

by Belinda F. DeGrazia.

(The statement referred to above was marked as Commission Exhibit No. 4.)

BY MS. LERNER:

Q Have you ever seen that before?

A When you say did I ever see this before, it looks like the date is my handwriting in the upper right-hand corner. Nothing else here looks like it's my handwriting, so I don't know if I've seen this before or not filled out that is entirely.

Q While you were working for Citizens for LaRouche did you ever have occasion to present a statement like this to a contributor for signature?

A I think I may have possibly.

Q Did you discuss this with Miss DeGrazia for signature?

A I don't remember if I did or didn't.

Q Why would you have written a date in the date slot unless you had presented it to the person for signature?

MR. MORGANROTH: If he did. He said it looks like it might have been his.

THE WITNESS: I don't know. This is all awhile ago and it's possible that I thought I was supposed to fill out two and Belinda was going to fill one out and I just handed it to her. I don't know why I would have put the date on both.

Q Mr. Warm, you said that most of your contributions or a lot of your contributions were by check or credit card because you wanted them to be submitted for matching?

A I don't think I gave a lot of contributions, but I suppose most of them were by check.

Q And yet you don't recall the circumstances of being asked to fill out one signature document?

MR. MORGANROTH: He said he did. He said he got the signature document and filled it out and he signed his own and that he supposes corresponds with the same $100 money order that was given that day.

BY MS. LERNER:

Q I believe he said for the record that he

did not recall the circumstances surrounding the signature of that document.

In other words how it was presented to him, where it was presented to him and by whom it was presented to him. Do you recall any of those?

A I'm sure that this had to have been in the office on Read Street because that's where we did most of these and a lot of financial things flowed through there, but I mean this couldn't have taken longer than five or ten seconds.

Q What are you referring to now?

A Well, any one of these things couldn't have taken longer than five or ten seconds to fill out, so I don't see -- I don't think these circumstances surrounding them would stick out as being that significant in my mind.

Q Do you recall who you gave your signature document to sign?

A No, it could have been any one of a number of people.

Q And who were those number of people that it

could have been?

A We had people coming in and out from New York. It could have included people such as Larry Freeman. It could have included Bob Primack who was then working in the office, possibly Debbie Freeman or other campaign volunteers.

I mean if the word came through from New York that we needed to verify contributions that we had personally given, that's relatively not problematic as far as getting somebody with a sheet of paper where that person knew he had given a contribution and having him sign to verify the contribution.

Q Under what circumstances would New York call and say they needed a verification for contribution?

A If the FEC said it was necessary.

Q Do you recall that happening more than once?

A If I say I recall it happening more than once you may ask me which particular occasions and I can't recall specific occasions. I'm sure it happened more than once.

Q When you volunteered for Citizens for LaRouche

s your title?

A I didn't have a title. I was a volunteer.

Q What were your duties?

A Primarily campaigning over the telephone. I did some occasional street organizing as it's called. Sometimes passing out literature in parking lots or at intersections attempting to raise funds that way and calling up people on the phone and briefing them on the latest developments in the campaign and I also made a trip to New Hampshire for about a week or so where I did a lot of door to door organizing.

Q While you were in Baltimore were you involved in fund raising?

A Yes.

Q Did you solicit funds?

A Yes.

Q Were you an agent of CFL for the purpose of fund raising?

MR. MORGANROTH: What's an agent? That's a legal term.

BY MS. LERNER:

Q Were you acting in the capacity of a representative of CFL for the purposes of fund raising?

A That's a funny question because I would not have taken it upon myself to let's say represent the CFL in some type of financial negotiation and things like that.

Q I'm talking about for fund raising purposes only.

A I guess you could say that I was representing, as a volunteer I was representing the CFL viewpoint if there was a viewpoint in terms of the campaign. I was asking people to give contributions on the basis of the fact that they would go to CFL.

Q Did anyone direct you to solicit campaign contributions, anyone from CFL direct you to solicit campaign contributions as a volunteer?

A People were all the time. Everybody in the organization was directing each other to solicit contributions. This is an ongoing process that went back way before CFL.

Q In the Baltimore office who was the person in

charge?

MR. MORGANROTH: Of what?

MS. LERNER: Of the CFL campaign organization in general.

THE WITNESS: Well, as far as whatever the -- I don't know who the formal officers were of CFL, who was formally designated as the person to do that sort of thing. I'm really not sure exactly what you are asking.

BY MS. LERNER:

Q Was there an office hierarchy in Baltimore I'm talking about?

A Well, the thing about the way the National Caucus of Labor Committees functioned for quite some time is that the individual members were expected to take a good deal of leadership initiative.

As far as the specific office hierarchy there are times when any one of a number of people might say that one activity or another should get going, but we had people -- you see when you are talking about Baltimore, you had people coming in from D.C. who would

occasionally give a certain level of direction or discuss things with people who were volunteers.

You had people from New York who would come in, people from Philadelphia.

Q In terms of fund raising, solicitation of funds?

A That was one of the principal activities of the organization as a whole and it didn't separate itself from the campaign activity as a distinct activity because as people were participating in the campaign activities they were fund raising.

Q Did you just walk into the office and say what am I going to do today? There was no one you would receive any direction from?

A A lot of times I wouldn't have to walk into the office and say, what am I going to do today because I basically knew that I was there to raise funds for the campaign. This was something that I knew long before CFL ever existed.

Q You mentioned a minute ago the National Caucus of Labor Committees. What was the relationship between

that and the CFL?

A Lyndon LaRouche personally started the National Caucus of Labor Committees. I don't remember the exact date.

I think it was in '68 or '70 or something like that. He was a candidate supported by the National Caucus of Labor Committees and CFL was being supported -- I say supported, a lot of the people who would join in volunteer activities who were CFL members were also members of the National Caucus of Labor Committees.

Q Was the National Caucus of Labor Committees directing the activities of CFL?

MR. MORGANROTH: At what time?

MS. LERNER: During the period while he was working as a fund raiser.

THE WITNESS: I don't think I could answer that. I'm not sure what that would amount to as a question.

BY MS. LERNER:

Q I think I still do not understand the relationship --

A CFL is a separate organization.

Q Yet you mentioned at the National Caucus of Labor Committees, at the National Caucus of Labor Committees that individuals were expected to take their own initiative. I'm trying to understand the relationship between that and CFL and the fund raising that went on in Baltimore.

A I'm not sure how to clarify this for you. I mean I'm just not sure what you are asking.

Q What was the relationship between the National Caucus of Labor Committees and Citizens for LaRouche in Baltimore or Citizens for LaRouche in general?

A The National Caucus of Labor Committees had a number of different campaigns that it was running.

Now, it included support of political attacks against environmental organizations, including investigations into terrorist activities to attempt to report where relevant to police organizations what it had found out. It included the N.I.S.P.H. news service for New Solidarity, executive intelligence review.

Now, I may not be right in terms of what that legal connections were between the two, but I know that the

National Caucus of Labor Committees was instrumental in beginning a lot of these things that eventually began the anti-drug coalition, National Unemployed and Welfare Rights Organization, the Defusion Energy Foundation and a number of other organizations, in fact so many organizations I'm not sure I can remember them all right now.

Lyndon LaRouche was the main person who started and gave political and philosophical and economical guidance of the National Caucus of Labor Committees. I think primarily because of that when he ran for president it was simply assumed -- I mean no one had said, you go out and you raise money for this or that campaign. People knew. You just knew.

That's what you were doing and there might be people who on occasion will say, you know we need to raise some more for a television show and there would be particular people in charge of those particular activities like Warren Hamilton out of New York came and spoke at a meeting in Philadelphia and discussed why the organization needed $5,000,000, or a million dollars or something like that.

We would go back from Philadelphia to Baltimore, a couple of us attended a meeting in Philadelphia with people from other parts of the country and discussed it with other members of the local why we needed to raise whatever amount of money was needed and that became the motivation. Does that clarify it any?

Q I think so.

If I am correct in my understanding the National Caucus of Labor Committees was a larger organization and CFL was one of the smaller organizations?

A No, I am sure CFL ultimately had to have been much, much larger because the Labor Committees were really a group of people committed to a specific political orientation and had undertaken a certain philosophical commitment to study certain specific things and to understand things and to gain a really in depth notion of how politics worked.

People in CFL, it could have been someone that just liked the idea of a new candidate on the scene and came in and worked and wanted to maybe put some posters up or something.

CFL would have been much, much larger if you just think in terms of the number of contributors alone.

Q How was the fund raising between these various organizations and the fund raising for CFL separated?

It sounds as if the same people were working on fund raising for different things.

MR. MORGANROTH: I think he has explained it enough times that even I understand it. The National Caucus of Labor Committees was nothing more than a political nucleus that sponsored or endorsed a candidate and it had nothing to do with CFL.

Now, some people in the National Caucus of Labor Committees may be volunteers for CFL because that's the candidate they want to support, but it has no connection between the two. CFL has its own political nucleus running for a particular candidate and that was it.

Now, the National Caucus of Labor Committees, some of the people that belonged to it may also support CFL.

MS. LERNER: When I asked him who gave CFL direction as far as the fund raising he indicated that

they would go to NCLC meetings and people there would say they needed money for a particular thing and they would proceed to go and raise money. That is why I asked what the relationship was as far as the funds.

THE WITNESS: I was referring specifically to one meeting that I could think of where we attended where Warren Hamilton who I believe was appointed the head of the CFL fund raising effort was instructing people -- whether it was formally designated as a CFL meeting I don't actually remember which to me personally it didn't make a whole lot of difference.

It might have made a difference to some of the CFL volunteers because they weren't necessarily committed to things that people in the Labor Committee were committed to.

BY MS. LERNER:

Q Did anyone at CFL instruct you concerning the solicitation of contributions?

A In what fashion?

Q How to solicit, what types of contributions to solicit?

A People are instructing each other all the time. You see you don't understand.

You are in an office with a number of different people. People get ideas about how to get contributions over the phone.

Q Let me be more specific. I think that I haven't been clear enough in my question.

Did anyone instruct you concerning the types of contributions that they wanted you to accept or that you could accept?

A Yes, and it would vary. I remember there was a time when we were supposed to take credit card contributions over the phone because that would -- I mean credit card contributions over the phone is a very effective, quick way to raise funds and then for awhile we weren't doing that. It may have taken awhile for us to get a credit card number so it was possible to do it.

There were people who on occasion, you know, when the word came down from New York we might have to switch around the mode in which we took the money.

Q Were you instructed concerning the record keeping

procedures having to do with solicitation of contributions?

A Well, I suppose we were instructed on it, but I don't know that there was a whole lot of instruction to be done. It was just a question of filling out the chit when it was a credit card.

Q I'm talking about any contribution that you collected.

A Whoever would be handling the finances in the office where there was some shift or change would have to notify people to do it one way or another. It's basically an administrative type of thing.

Different people were doing that at different times. At one point I was -- now there are two different things here which maybe I am confusing in my mind. One is the reporting of the money to New York which went by a telex type set-up and the other is like whatever got sent off, physical things that would go from one place to another and different people would do different things at different times.

Q All right. Let's take the contributions from

the time you collected the --

A Which contribution?

Q Other than a credit card contribution.

MR. MORGANROTH: Do you mean a check?

BY MS. LERNER:

Q Let's take a check. You received the contribution and what happens with it then?

A Well, you say I received the contribution.

Q You solicited the contribution from someone and they write you a check for Citizens for LaRouche. What would happen to the check?

A I would bring it to someone in the office, whoever was handling it for that night and it would be counted up with the rest of the money for the night.

Q And then what would happen?

A Presumably that person would send it off to New York.

Q Were you ever the person to send it off to New York?

A I believe I was involved in express mailing some things to New York. I'm not sure what the contents

were because I didn't bother counting it each time. Different people were involved in the counting end of it and sending these things off.

Q Who were the people who were in charge of preparing the contributions for sending?

A That shifted. You see what would happen is that we had people who would go out into the field and they would raise whatever money they raised in the field. I am literally on the street, shopping centers or wherever and then there are people in the office who are involved in making phone calls and sometimes like I would get someone telling me that they have a contribution and I would go out and pick up the money and then bring it back to the office.

Out of the entirety of all the people working in the office there would generally be someone stuck with having to count up the money and/or write a report to New York on the telex and/or send it by express mail and/or in some cases there were wires, but I think that that stopped.

We used to wire money a long time ago. I don't

know if we wired money during the CFL campaign or not.

Q Is it my understanding that there was not ever a specific person and that everyone in the office did that at some time or another?

A Pretty much, yes. I can name the names of the people who did it. We were not very happy about having to do it because it seemed to waste a lot of time.

Q Well, who are the people who did it?

A Tom Szymecko, Gerald Belsky, Linda DeGrazia, Nancy Radcliffe, Gerald Berg and there were other people, too. Those are some of the names that I can recall. Sometimes if organizers were coming in from Philadelphia or from somewhere else, if we were fortunate they would have a role in some of this.

Q Did Debra Freeman ever do that?

A Count up the money and do the reports and so forth?

Q Yes.

A It's possible.

Q What was her position in the office?

A Her formal designation?

Q Did she have a formal designation?

A I don't know if she ever had a formal designation. That was never particularly important to me.

Q What was her job? What were her duties?

A Well, she certainly always has been a leading member of the Labor Committee. I don't know what her specific tasks were.

You see one of the things with Debbie is that she was not always around because she was traveling to one city or another.

She knows a lot and she is very articulate, so she would sometimes be called upon to go to another region and discuss with organizers how it was going, but as to specific roles or duties, she was raising money like we were raising money.

I think she was probably a lot better at it than some people.

Q You just described what would happen with a check that you collected as a contribution.

A Yes.

Q Was the procedure different if the contribution was in cash?

A Are you talking about a cash contribution for CFL or are you talking about a contribution for -- there are a lot of things that we were doing at the same time.

Q Like cash contributions at CFL?

A If there is a cash contribution for CFL, I think we had little slips in addition to these that we try to get filled out to verify those.

Now, I might be confusing this with the Committee to Elect LaRouche, but I think we had slips where the people could fill those out.

Q What about a money order contribution to CFL? What was the procedure once you had collected that?

A Well, I wasn't involved in terribly many of those and I'm sure it would be correct to characterize it as there having been a procedure.

Q If you had collected a money order what would you do with it?

A If I tried to?

Q Did you ever collect the money order?

A I might have. I don't know.

Q Did you have any understanding concerning the type of contributions that could be submitted for matching funds?

A I had some idea about it.

Q What was your understanding?

A My understanding is that there was some kind of limitation on the amounts that individuals were allowed to give. I think it was a thousand dollars, that it was better if it was in writing and if it wasn't then it wasn't, but I had some trouble with all of that because it seemed like it shifted around quite a bit as to what met the criteria of the FEC and what didn't, so overall it's really not clear to me what was the absolute best procedure. I guess checks were the best thing to get if you could get them.

Q Did you ever purchase any money orders for other people to contribute to Citizens for LaRouche?

A I think I purchased one money order, maybe two.

Q And who were they for?

A I'm not sure about this, who the particular individuals were, but I think I purchased one or two that were to be -- they had either given -- they had given some cash and I think it was later verified, but you see we were raising funds for so many different things, I may have purchased a money order for something and it may not have been for CFL.

Q Do you specifically recall taking cash and purchasing a money order for someone else as a contribution?

A I think I did once.

Q Do you recall who that person was?

A I'm not sure who the person was. I was raising money from a lot of different people and then I am pretty sure we went and got some verification of that from the person later on.

Q What would the verification be? When you say verification --

A One of these type things.

Q The witness is referring to Exhibit 4, a statement saying that the person had contributed a certain

amount to Citizens for LaRouche on a certain date.

Do you know a man by the name of Charles Clark?

A Yes.

Q Did Mr. Clark ever give you a contribution to Citizens for LaRouche?

A Probably, yes he has given me contributions. I'm sure some of them were for Citizens for LaRouche.

Q Do you recall in what form you received those contributions from Mr. Clark for Citizens for LaRouche?

A I can remember some $20 and $10 bills.

Q Those would be cash contributions?

A Cash contributions.

Q Do you recall Mr. Clark ever giving you money or to contributions to Citizens for LaRouche?

A I don't remember him ever giving me a money order, but it's certainly possible that someone purchased a money order form.

Q And how would that happen?

A Well, Charles might have given them $20 to purchase

4804 037 87736

a money order. I mean I don't know how much he gave over time.

Q I will ask the reporter to mark this as Commission's Exhibit No. 5 for identification, an American Express money order made out to Citizens for LaRouche dated November 13, 1979 in the amount of $70 from Charles Clark.

(The American Express money order referred to above was marked Commission Exhibit No. 5.)

BY MS. LERNER:

Q Have you ever seen Commission Exhibit No. 5 before?

A I don't think so.

Q Is that your handwriting on Commission's Exhibit No. 5?

A It doesn't look like it.

MS. LERNER: I ask the reporter to mark this as Commission Exhibit No. 6 for identification. It is a statement dated February 21st, 1980 which says,

I contributed $70 to Citizens for LaRouche on November 10, 1979 and it's signed Charles Clark.

(The statement referred to above was marked Commission Exhibit No. 6.)

BY MS. LERNER:

Q Do you recognize Commission Exhibit No. 6? Have you ever seen it before?

A It looks like one of the forms that we would have used to verify a contribution and it looks like a contribution verification.

Q Did you ask Mr. Clark to sign Commission Exhibit No. 6?

A I probably did or possibly did. I don't know. It was awhile ago.

Q At whose instruction did you ask Mr. Clark to sign that?

MR. MORGANROTH: He said he possibly did. It's more than speculation.

BY MS. LERNER:

Q I hand you now what is the deposition of

Charles Clark and ask you to take a look at Line No. 1. Then Mr. Warm came to you and asked you to sign a slip saying that you made a contribution of $70 and the answer is yes and I ask you if that refreshes your recollection.

MR. MORGANROTH: May I see it first, please?

MS. LERNER: Certainly.

THE WITNESS: Well, if Charles said I came and gave him the slip, then I probably did.

MR. MORGANROTH: That isn't what she asked you. She asked you does that refresh your memory as to whether or not you did.

THE WITNESS: I think I did. I can't remember the specific circumstances.

The amount here says $70 and I don't remember that as being a specific amount that I asked him for one of these, but it's quite possible that I did, sure.

BY MS. LERNER:

Q Did you fill out any portion of Commission Exhibit No. 6 for Mr. Clark?

A Well, looking at it it looks like I -- it looks

like my printing at the bottom of it for his address.

Q Did you fill in the amount contributed the $70?

A It doesn't look like my writing, but it's too vague to be able to tell. I don't think I did.

Q Did you tell Mr. Clark the amount that he had contributed?

A I don't -- I really don't remember the discussion that I had with him, but if I gave him something to sign, I wouldn't have done so unless at that time I had actually understood that he had contributed that amount of money.

Q I ask you to take a look at Mr. Clark's deposition again at Line 14. Did you sign a document saying that you made a contribution for $70 to Citizens for LaRouche?

A Yes, I did, one by Steve. He had told me I had given a contribution of $70.

MR. NOBLE: For the record the transcript has just been given to Mr. Morganroth to review.

MR. MORGANROTH: Are you asking him to testify as to the testimony of someone else?

MS. LERNER: I'm only asking him if that refreshes his recollection as to whether or not he told Mr. Clark the amount of the contribution he made.

THE WITNESS: It doesn't do a whole lot to refresh my memory. It's not inconceivable that I could have said that to him particularly since I know he gave over that amount.

BY MS. LERNER:

Q I would like you to take a look at Commission Exhibit No. 5 which is the American Express money order for the Charles Clark contribution and the Commission Exhibit No. 6 which is Mr. Clark's signature document.

MR. MORGANROTH: Excuse me for a second since you are refreshing his memory, I think we have a right to see the entire transcript.

MS. LERNER: I believe you already have this.

MR. MORGANROTH: I don't have it in my hands.

MR. NOBLE: We will show it to you now, but at your insistence we have given copies of it to the Citizens for LaRouche already.

MR. MORGANROTH: I don't have the files with me

and I'm sure this witness hasn't read them.

MS. LERNER: For the record I've given Mr. Morganroth the copy of the Charles Clark deposition.

BY MS. LERNER:

Q Reviewing Commission Exhibit No. 5 and 6, on the Charles Clark money order you will note that the date is November 13, 1979 of the money order?

A Yes.

Q Yet the date on the signature document from Mr. Clark said that he gave the contribution on November the 10th, 1979. Can you explain this discrepancy?

A Well, I don't know about this particular money order. I don't know that this $70 doesn't refer to some other contribution. It's possible that it is to verify this money order.

Q If you asked someone for a verification, was it your procedure to find out what you were having them verify before you ask them to verify it?

A Was it my procedure to what?

Q If you were going to ask someone for a verification, did you learn what you were asking them

to verify before you went and asked them to verify it or did you just simply say verify a contribution?

A Well, if I knew that he had contributed a specific amount of money I wouldn't have had to ask someone concerning a verification of that amount of money.

Q You just indicated before that you did not know that Mr. Clark contributed $70?

A No, I don't think that I indicated that. I indicated that he had given amounts of $20 at a time, $10 at a time.

I mean you are talking about an amount less than $100 that occurred a couple of years ago and you are asking me to tell you in very specific details everything that happened around that amount of money. I think that's unreasonable.

Q I'm not asking you to answer any specific detail. I'm asking you to answer a general question, if you want someone to seek verification of a contribution, would you not have had to find out what that contribution was that you were asking them to verify

before you went and asked them to verify it?

A Probably, yes.

Q And yet you have no way to explain the discrepancy between the date on the verification and the date on the money order, is that correct?

A I'm not sure that there is a discrepancy. How do you mean there is a discrepancy?

Q The money order is dated November 13.

A Right.

Q The signature document says that the contribution was made on November the 10th.

A Right.

Q Three days before the money order was purchased, how do you explain that?

A How is that a discrepancy?

Q The contribution was made on November 10, yet the money order was purchased on the 13th.

A The money order was probably purchased for the contribution.

Q In other words, Mr. Clark gave cash and a money order was then purchased?

A And then he verified that he had given the cash. I assume that's what is going on.

Q All right, I ask the reporter to mark this as Commission Exhibit No. 7 for identification, a Federal Express money order in the amount of $45 made out to Citizens for LaRouche from David Sanders.

(The Federal Express money order referred to above was marked Commission Exhibit No. 7.)

BY MS. LERNER:

Q Have you ever seen Commission Exhibit No. 7 before?

A I don't know if I have or I haven't.

Q Did you purchase it?

A I don't believe I did.

Q Did you fill out any part of that money order?

A It doesn't look like my handwriting.

MS. LERNER: I ask the reporter to mark this as Commission Exhibit No. 8 for identification. It is an American Express money order made out to Citizens for LaRouche

in the amount of $25 from David Sanders.

(The American Express money order referred to above was marked Commission Exhibit No. 8.)

BY MS. LERNER:

Q Have you ever seen Commission Exhibit No. 8 before?

A I don't think so.

Q Did you fill out any part of that exhibit?

A This is not my handwriting.

Q I ask the reporter to mark this as Commission Exhibit No. 9 for identification, an American Express money order in the sum of $150 made out to Citizens for LaRouche by Ernest K. Pulsifer.

(The American Express money order referred to above was marked as Commission Exhibit No. 9.)

BY MS. LERNER:

Q Do you recognize Commission Exhibit No. 9?

A No.

Q Did you purchase it?

A No.

Q Is any of the handwriting on it yours?

A No.

MS. LERNER: I ask the reporter to mark this as Commission Exhibit No. 10 for identification.

(The American Express money order referred to above was marked as Commission Exhibit No. 10.)

MR. MORGANROTH: I would like for the record to state that there are parts in the deposition that I have read with Charles Clark where it says he did give $70 and he did it at different times in cash totaling $70 and it was $70 that he gave which somehow was not shown to refresh the witness' memory and Mr. Clark had apparently said he did give $70 in cash and it was a total accumulation of $70 that he had given.

MS. LERNER: All right. Commission Exhibit No. 10 which has been marked is an American Express money

order in the sum of $150 made out to Citizens for LaRouche and the sender's name is Anne Taylor.

BY MS. LERNER:

Q Do you recognize Commission Exhibit No. 10?

A No.

Q Is any of the handwriting on it yours?

A No.

Q Did you purchase it?

A No.

MS. LERNER: I ask the reporter to mark this as Commission Exhibit 11, a Traveler's Express money order made out to the Citizens for LaRouche in the amount of $250 signed by Nancy Radcliffe.

(The Traveler's Express money order referred to above was marked Commission Exhibit No. 11.)

BY MS. LERNER:

Q Did you purchase that money order?

A No.

Q Is any of the handwriting on it yours?

A No.

Q Was it common practice at the CFL office in Baltimore for money orders to be purchased to represent cash contributions that had been given?

A Well, I don't know -- I know that there were times when that was done, but generally for you to characterize that as a common practice of the Baltimore office, it wasn't a question of the Baltimore office. It was what the National CFL headquarters had said to do with whatever a particular contributor had given. I mean I wouldn't say common practice. Mainly you want to try and get checks wherever you could get a check since there would be no question.

MS. LERNER: I have no further questions.

EXAMINATION BY MR. MORGANROTH:

Q Was Mr. Clark a Vietnam veteran?

A I believe he was.

Q In your experience with him did he have problems with association and memory?

A It was sometimes difficult to figure out what he was talking about. It was often difficult to figure

out what he was talking about.

Q Now, Mr. Warm, I show you Exhibit No. 2 and ask you would you have signed Exhibit No. 2 unless you had contributed $100 on that day of January 22nd?

A No.

Q It was your understanding, was it not, that if a money order was ever purchased by cash that such a statement had to be given in order to give authenticity to that money order?

A Yes.

Q Now, tell me it's true, is it not, that CFL raised over a million dollars?

A That's my understanding.

Q And basically it's from small contributions?

A Yes.

Q Would it be accurate to say there were tens of thousands of perhaps contributions that were made?

A That's probably accurate.

Q Do you remember all the contributions that you received?

A I couldn't possibly. I mean all I was doing

was fund raising after work every night and on weekends. I talked to hundreds and hundreds of people.

Q So you worked full-time during the day?

A That's right.

Q You did fund raising at night?

A Yes.

Q And also you were doing other things in your political life of support of, as you say other organizations, let's say the anti-drug coalition, whatever political approaches, is that correct?

A Yes.

Q And you were pretty busy, were you not?

A Very.

Q And during the course of that time how many people would you say were working for the election of Lyndon LaRouche?

A That I personally came into --

MR. NOBLE: Can you clarify that question? Do you mean nation-wide?

MR. MORGANROTH: Nation-wide to start with.

MR. NOBLE: If he knows.

THE WITNESS: Nation-wide there had to have been thousands.

BY MR. MORGANROTH:

Q And how many were there totally in the Baltimore area including people that came in and went out and people from other areas and left and people who were volunteers and contributors, how many people do you think that that would take in?

MR. NOBLE: I'm going to object. There has been no foundation that he would know any of this. He has stated that he is a volunteer who was out in the streets most of the time.

THE WITNESS: I didn't say I was out on the streets most of the time. I was on the phone most of the time. I was out on the street some of the time, but not very much of the time.

BY MR. MORGANROTH:

Q How many people would you estimate by your experience and contact were working in the Baltimore area on and off, in and out contributors part-time and full-time.

A I would say there were dozens of people

coming in and out of the office in Baltimore. In New Hampshire it was hundreds and hundreds.

There were a lot of people coming out of the office in Baltimore and of course there were people who had come to events in larger settings who were also considered as CFL volunteers such as at the Hilton where I believe we had a fund raising event there.

There were a lot of people coming in and out of the Baltimore office. It's hard for me to give an exact estimate.

Q And you say in New Hampshire there were hundreds?

A Definitely there were hundreds in New Hampshire.

Q How long did you work in New Hampshire?

A About a week.

Q Did you ever go out of Baltimore to other areas and work?

MR. NOBLE: Can you explain the relevancy to this investigation?

MR. MORGANROTH: I wouldn't know what the relevancy in asking him what he did and his duties and responsibilities and how many people he saw, gee,

I would think --

MS. LERNER: I think the investigation concerns the Baltimore office of CFL.

MR. MORGANROTH: That's why I asked him how many people came into Baltimore and you were also asking him certain questions as to his memory and refreshing his memory and I am showing during that time it was very hectic and he was meeting hundreds of people, not just in Baltimore but in New Hampshire and I think it's very relevant.

BY MR. MORGANROTH:

Q Now, sir, if I may continue as far as your functions, your testimony is that you came in contact with literally hundreds of people during the campaign, is that correct?

A That is right.

Q Did Mr. Clark ever call you and tell you about his being questioned by the Federal Election Commission?

A No, I don't believe he ever called me, but by the time all of this, that I had received a subpoena

I was no longer active as an organizer.

Q Were you aware that he was told that if he was to talk to you or anybody else --

MR. NOBLE: I object to this. It is totally outside the scope of this investigation. This is not the litigation deposition.

You had an opportunity to cross-examine the witness during the litigation deposition. This is totally outside the scope.

MR. MORGANROTH: Were you aware that he was told that there would be criminal penalties if he should talk to you or anybody else?

MS. LERNER: I would like to see that. I believe if you are asking to state what was said in this deposition that you should state it correctly. He was not told that he would be criminally penalized if he told anybody about this.

MR. MORGANROTH: Let me read it into the transcript. You will agree that Mr. Bogin was general counsel.

MR. NOBLE: I will not.

MR. MORGANROTH: Was he one of the counsel for the Federal Election Commission?

MS. LERNER: He was an attorney for the Federal Election Commission.

BY MR. MORGANROTH:

Q I would like to advise you, Mr. Clark, that this matter is confidential and that you should not speak about it with anybody other than your attorney and that there happens to be criminal penalties associated with that provision, so you should be careful in who you talk about this matter with. Did you know he was told that?

A I didn't know that.

Q And I will read again, Mr. Bogin, you understand that it is a violation of the law for you to talk about this matter with anybody other than your attorney. Did you know that he was told that by Mr. Bogin?

A I wasn't active in the campaign at that time. I heard that Charles was deposed, but I didn't receive too many details about it.

Q We know the confidentiality provision.

That is not properly spelled out later. You are allowed to talk to the respondent. It's the respondent's privilege to waive. We know that, too.

MS. LERNER: Unless the respondent has waived in writing their confidentiality.

MR. MORGANROTH: You didn't even tell the man who the respondent was to tell him who he could talk to. You didn't say he could talk to the respondent.

MR. NOBLE: I think this whole line of questioning is outside the scope.

MR. MORGANROTH: I know anything that you don't like is outside the scope.

BY MR. MORGANROTH:

Q Now, sir, you got a certain letter and subpoena that we stipulated to. Tell me, did you ever get a letter from them asking you for further verification of the $100 money order item that has been produced today as Exhibit No. 1?

A No, sir.

Q Did you even know what they were even trying to indicate to you by their subpoena and letter?

A No, sir. In fact I thought it had to do with the 1976 congressional election of Debra Freeman of which I was treasurer.

Q Have they sent to you just a letter saying we have this $100 money order and this statement, would you have responded and told them that you gave $100 at that time?

MR. NOBLE: I'll object again. It's totally outside the scope of the examination of this deposition which is in relation to enforcement matters and not the litigation and if you continue this we will terminate the deposition.

MR. MORGANROTH: Fine, I feel sorry for you.

BY MR. MORGANROTH:

Q Go ahead. You may answer, sir.

A I would verify that I've given $100. I have no problem with that.

MR. MORGANROTH: I have nothing further. You may terminate the deposition at any time that you want. I am sorry that I asked that many questions in this two hour examination. I am sorry I took seven

minutes and they objected all the way through.

EXAMINATION BY MS. LERNER:

Q Just one more question. You testified to Mr. Morganroth that there were dozens of people that were in and out of the Baltimore office working there for Citizens for LaRouche, is that correct?

A Volunteers were coming and going from different parts of the country as well as from within Baltimore.

Q There are other people who were working there who were not volunteers.

MR. MORGANROTH: That's not what he said.

BY MS. LERNER:

Q Okay. There were dozens of volunteers who were working in the office?

A Sometimes you would get people who would come in and they just wanted to get an idea of what the candidate was about. I wouldn't call them a volunteer.

Q But of the dozens of volunteers that you mentioned that were working there, there was no one who was considered responsible for the overall operation and the office in Baltimore, is that correct?

A I don't think I could say this person is responsible or that person is responsible for the overall office functioning. There may have been someone formally designated for the campaign. I'm not sure who that person was.

Q Mr. Warm, you have a right to read your deposition transcript and sign it or you may waive that right. You may want to confer with your counsel about that and also you may want to confer with your counsel concerning the confidentiality requirements of the Federal Election Campaign Act.

MR. MORGANROTH: Who is the respondent in this MUR, do you know?

MS. LERNER: Yes, I do know.

MR. NOBLE: I think on the record we should state that Mr. Warm is not the respondent in this MUR.

MR. MORGANROTH: I didn't ask you who wasn't. I asked who was.

MS. LERNER: Let him finish his statement.

MR. NOBLE: Again we have the problem that we have no written waivers from anyone.

MR. MORGANROTH: I'm going to instruct you right now that he will say what he wants when he wants. He is a plaintiff in a civil lawsuit and he has a right to repeat anything that is of any relevance to that lawsuit.

He has been deposed in another examination asking him questions that you would say in this particular deposition should never be repeated. I am only telling you so that I don't like these threats.

MS. LERNER: We have not threatened him.

MR. MORGANROTH: I am telling you that as far as your confidentiality, you don't repeat anything outside of a Court of Law or outside of that Commission. We will repeat as we please because we are the plaintiffs and people have already stated on the record and testified at your direction and questions in open proceedings.

MS. LERNER: You may do what you like. It is only our job to describe the confidentiality requirements to any person that is deposed in an enforcement matter.

MR. MORGANROTH: We really appreciate your kind, kind consideration.

MR. NOBLE: And, in fact, in this situation if you will remember back just a few short minutes ago what we said to him is that you may confer with your attorney about the confidentiality provision so that you have the opportunity to give your interpretation of the provision to him.

MR. MORGANROTH: Thank you very much for that privilege. I would advise my client without you advising him.

MS. LERNER: At this time, Mr. Warm, I hand you a check for $35 which is your witness fee for appearing today and the deposition is now terminated.

One of the matters before we close the record, have you made a decision concerning waiver of signature?

MR. MORGANROTH: Yes, we will waive signature.

MS. LERNER: Also, I would like to move all of the exhibits into evidence.

MR. MORGANROTH: No objection.

(Examination concluded.)

REPORTER'S CERTIFICATE

STATE OF MARYLAND

COUNTY OF BALTIMORE:

I hereby certify that on the 4th day of June, 1982 before me personally appeared STEVEN G. WARM who was first duly sworn to tell the truth, the whole truth and nothing but the truth;

That the testimony of the said STEVEN G. WARM was reduced to writing by me, and the aforegoing is a true record of the testimony given by the said deponent.

I further certify that I am not attorney, relative nor employee of any party hereto, nor otherwise interested in the event of this cause.

In witness my hand and notarial seal this 19th day of July, 1982.

Notary Public (Seal)

LTIMORE, MARYLAND 21202

13940672761

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.

Washington, D.C. 20463

Attn: L.M. Noble

FEDERAL EXPRESS MONEY ORDER

119851804 64-79 611

PAY THE SUM OF 50-008 $100.00

PAYABLE TO Citizens For LaRouche

NOT VALID OVER $500.00

FROM Steven C. Warm

ADDRESS 310 Ridgewood Rd.

CITY Bath STATE Md ZIP CODE 21210 DATE 1-22-80

FEDERAL EXPRESS SERVICES CORP. DRAWER - DRAWEE

:061100790: 119851804# 74

Com. 2

6/4/82

JANUARY 22, 1980
(date)

I contributed $100.00 to Citizens for Larouche on

JANUARY 22, 1980.
(date)

signed

Steven G. Warm
(signature)

DATE _____ DEPOSIT CODE _____

310 RIDGEMADE ROAD
(address)

BALTIMORE MARYLAND

3

6/7/82

FEDERAL EXPRESS MONEY ORDER

119851803 64-79/611

50-008 400.00

PAY THE SUM OF

PAYABLE TO Citizens for LaRouche

NOT VALID OVER $500.00

FROM Belinda F. deGrazia

PURCHASER

ADDRESS 310 Ridgewood Rd

FEDERAL EXPRESS SERVICES CORP. DRAWER - BRANCH

CITY Baltimore STATE Md ZIP CODE 21210 DATE 1-22-80

:061100790: 1198518039" 74

Com 4

6/4/82

JANUARY 22, 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22, 1980.
(date)

signed

L. L. D. T. de Thrie

DATE _____ DEPOSIT CODE _____

310 Ridgemede Road
(address)

10 Rail Maryland 2

Exh. 5
6/4/82

AMERICAN EXPRESS MONEY ORDER

NOV 14 1979

55-466,938,402

PAY THE SUM OF
NOT GOOD OVER $200

DATE Nov 13 19 79 ONE SUM TO DOLS 00 CTS

TO THE ORDER OF Citizens to Recall LaRouche

Jane Adams
CHAIRMAN

SENDER'S NAME AND ADDRESS Charles Clark 14 North Hilton St. Baltimore Md.
Balt

BEFORE CASHING READ NOTICE ON BACK

⑈10 20⑈ 000 1⑆55 ⑈4669384023⑈

Com 6

6/4/82
(date)

I contributed $ 70 oc to Citizens for LaRouche on
(amount)

11/10/79. This contribution was from my own personal
(date)

funds and not drawn on an incorporated account.

signed

Charles Clark
(signature)

16 N. Hilton Street
(address)

Baltimore Maryland
(City) (State)

CHARLES CLARK

Conc 7

6/4/82

FEDERAL EXPRESS MONEY ORDER

113833058

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens Sv Balto.

NOT VALID OVER $500.00

FROM David Sanders

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/28

FEDERAL EXPRESS SERVICES CORP
AN NCC COMPANY
DRAWER - DRAWEE

:061100790: 113833058 74

Exh 8
6/4/82

Att. 1. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

Balt.

PAY THE SUM OF
NOT GOOD OVER $200

DATE 4/3 19 74 SUM 25 DOLS 00 CTS

TO THE P. Finder Fm. LaRuche

David Sanders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

David Sanders

1:1020:0001155 46731646720

Com 9
6/4/82

AMERICAN EXPRESS MONEY ORDER

23-1
1020

55-466,938,424

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 12-4-77 THE SUM 150 DOLLARS 00 CTS

TO THE ORDER OF Citizens for Ivan Rowles

CHAIRMAN

SENDER'S NAME AND ADDRESS Edwin K Polsin
Baltimore

BEFORE CASHING READ NOTICE ON BACK

1:1020:000 1:55 4669384248

16

Com 10
6/4/82

01

AMERICAN EXPRESS MONEY ORDER 23-1/1020

11126

55-466,938,411

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 6/20 19 82 THE SUM OF 150 DOLLARS 00 CTS

TO THE ORDER OF Alaska Lekula

CHAIRMAN

Anne R Taylor 1304 Sh.S.F Fairb. Ak

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈ 000155 ⑈669384113⑈

Conn II
6/4/52

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for LaRouche

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 21:S250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF MINNEAPOLIS

Nancy Rakeliff

PURCHASER, SIGNER FOR DRAWER

3215 N Charles - Balto 21218

PURCHASER'S ADDRESS

:091900533:189 2926722" 90

12

~~Treasurer Dept. Ex. #~~ Commission Ex. No. 1 GCC# 2912

July 30, 1980
SDA

CHECK SAMPLE

80 OCT 3 A 9:22

FIRST NATIONAL BANK

August 6 1977

BRANCH AND CITY

PAY TO THE ORDER OF Citizens for Mahoney $ 400 00

four hundred dollars DOLLARS

Debra Hannon Freeman

ADDRESS 4004 Linkwood Rd. Balto Md. TELEPHONE NUMBER 301-243-0199

Writer's Initials Date

Commission Ex. No. 2.
July 30, 1980
SPA

CHECK SAMPLE

FIRST NATIONAL BANK

November 21 1979

BRANCH AND CITY

PAY TO THE ORDER OF Citizens for LaMonte $ 15.00

fifteen dollars DOLLARS

Debra Hanover Treasurer.

ADDRESS 4004 Hinkwood Rd. Balto 21210.

TELEPHONE NUMBER 301-243-0195

Writer's Initials

Date

Commission Ex. No. 3.
July 30, 1980
SDA

CHECK SAMPLE

FIRST NATIONAL BANK _____ 19____

BRANCH AND CITY

PAY TO THE ORDER OF Citizens for h. Rouche. $ 45.00

Forty five dollars DOLLARS

Debra S. Hover

ADDRESS 4004 hickwood Rd Balto 21210 TELEPHONE NUMBER 301 243 0199

Writer's Initials _____ Date _____

Commission Ex. No. 5

July 30, 1980
SDA

MONEY ORDER SAMPLES 7

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens Sv Ln Baltimore

SENDER Ann R. Taylor

SENDERS ADDRESS 1304 John Street Baltimore Md.

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

7/30/80
DATE

Ann R. Taylor
AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

Commission Ex No. 6
July 30, 1980
SDA

MONEY ORDER SAMPLES 7

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens for LaRouche

SENDER Nancy Radcliffe

SENDERS ADDRESS 3215 North Charles Street Balto 21215

DO NOT PAY OVER $100.00

DOLLARS | CENTS

PAY THE SUM OF _____ DOLLARS

January 12, 1979 Nancy Radcliffe _____

DATE AUTHORIZED SIGNATURE NO.

Writer's Initials _____ Date _____

Commission Ex. No. 7
July 30, 1980
SDA

MONEY ORDER SAMPLES 7

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens So. La Porte

SENDER Kevin Salsbury

SENDERS ADDRESS 1909 North Forest Park Avenue Baltimore

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

Jan 12, 1979
DATE

Kevin Salsbury
AUTHORIZED SIGNATURE

NO.

Writer's Initials _____ Date _____

Commission Ex No 8
July 30, 1980
SDA

MONEY ORDER SAMPLES 7

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens So LaBouche

SENDER David Sanders

SENDERS ADDRESS _____

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

7-30 80
DATE

David Sanders
AUTHORIZED SIGNATURE

_____
NO.

Writer's Initials _____ Date _____

Commission Ex. No. 9
July 30, 1980
SDA

MONEY ORDER SAMPLES : 7

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens Co LaPlace

SENDER Charles Clark

SENDERS ADDRESS 14 N. Hilton Street Baltimore Md.

PAY THE SUM OF _____ DOLLARS

DO NOT PAY OVER $100.00

DOLLARS | CENTS

_____ DATE

Charles Clark. AUTHORIZED SIGNATURE

_____ NO.

Writer's Initials _____ Date _____

Commission Ex. No. 10
July 30, 1980
SDA

MONEY ORDER SAMPLES

FROM _____ DATE _____

ADDRESS _____ CITY & STATE _____

PAY TO THE ORDER OF _____

DO NOT PAY OVER ONE HUNDRED DOLLARS

AMOUNT _____ DOLLARS

PAY TO THE ORDER OF Citizens So. Hallandale.

SENDER Ernest Pulsifer.

SENDERS ADDRESS Baltimore Maryland.

PAY THE SUM OF _____

DO NOT PAY OVER $100.00

DOLLARS | CENTS

DOLLARS

_____ DATE

Ernest Pulsifer. AUTHORIZED SIGNATURE

_____ NO.

Writer's Initials _____ Date _____

Commission Ex No. 11
July 30, 1980
SDA
Sample II

ENDORSEMENT AND ADDRESS

Mary Cavanaugh.

Steven Wann

Belinda T. DeGrazia

Robert A Robinson.

Edward St. John.

Ruston Ghordi

Arthur Murphy

Constantin Philios
Philios

Writer's Initials _____ Date _____

Commission Ex. No 4
July 30, 1980
SDA

SAMPLE I(a)

January 23, 1980
(date)

I contributed $ 250.00 , to Citizens for Larouche on

January 15, 1980 .
(date)

signed

Harold H Harrison M.D.
(signature)

3900 North Charles Street.
(address)

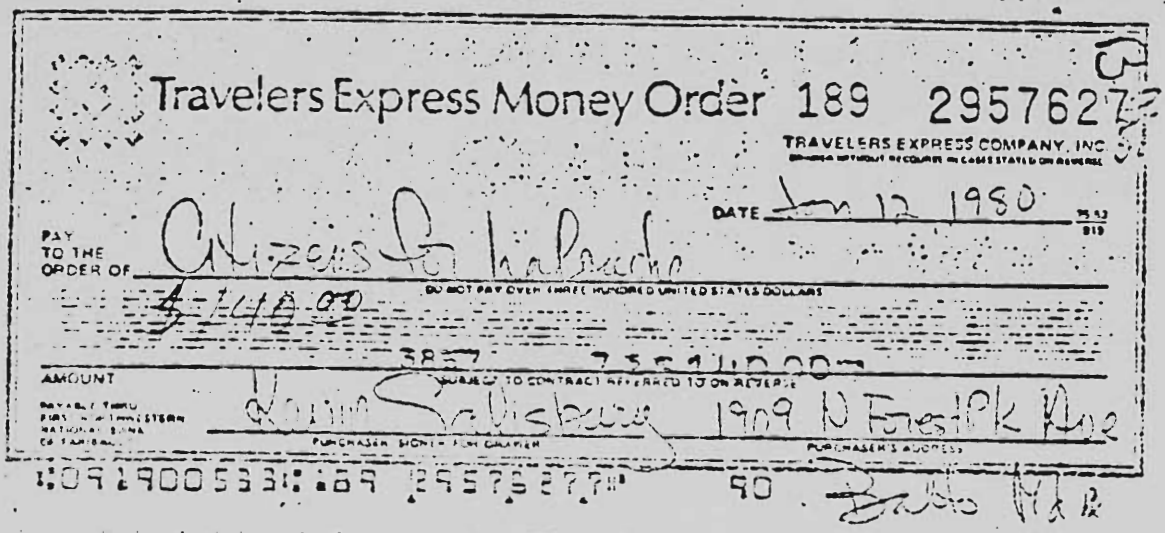
Baltimore Md.
(City) (state)

6 1980 AM 10: 12

Commission Ex. No. 14
July 30, 1980
SDA

ATTACHMENT #3
page 1

DATE 1-15-80 DEPOSIT CODE 1-2


Travelers Express Money Order 189 2957627
TRAVELERS EXPRESS COMPANY, INC.
DATE Jan 12 1980
PAY TO THE ORDER OF Citizens Fed Indpendn
DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS
$ 1410.00
AMOUNT
PURCHASER SIGNS FOR COUNTER
Ronnie Salisbury 1909 N Forest Pk Rd 2
PURCHASER'S ADDRESS
Baldwin Park

DATE 1-15-80 DEPOSIT CODE 1-2

Commission Ex No. 15
July 30, 1980
SDA

ATTACHMENT # 1
page 4

FEDERAL EXPRESS MONEY ORDER

113833058 44/6

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens Co Intercede

NOT VALID OVER $500.00

FROM David Sanders

PRESIDENT

FEDERAL EXPRESS SERVICES CORP.
AN NDC COMPANY
DRAWER - DRAWEE

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

:056100790: 1138330584m 74

Commission Ex No. 16
July 30, 1980
SDA

ATTACHMENT #1
page 5

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

Commission Ex No. 17
July 30, 1980
SDA

2-23-80
(date)

I contributed $ 45.00 to Citizens for LaRouche on 2-23-80.

Daniel Taylor
(name)

613 St. Annes Ave.
(address)

Balto, Md. 21218

If contribution is over $100

Lab Technician
(occupation)

State of Maryland
(place of employment)

State Office Bldg Preston St
(address)

Balto Md 21201

Commission Ex. No. 20
July 30, 1980
SDA

ATTACHMENT #1
page 3

January 22, 1980
(date)

I contributed $ 1,029.58 to Citizens for Larouche on

January 22, 1980
(date)

David Sanders
signed

David Sanders
(signature)

613 St. Paul's Ave
(address)

Baltimore Md.
(City) (state)

Renee Sanders (spouse) David Sanders

613 St. Paul's Ave
Baltimore Md.

Commission Ex. No. 21
July 30, 1980
SDA

ATTACHMENT #1
page 6

DATE 1/9/80 DEPOSIT CODE 1-1

AH 1. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 80 SUM 25 DOLS 00 CTS

TO THE Point Fm. LaRuche

David Saunders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

David Saunders

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000⑆55 ⑈4673⑆4671⑈

Commission Exh No 22
July 30, 1980
SDA

ATTACHMENT #5
page 7

Pulsifer 6
7/23/80

12-4-79; 1-1

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-466,938,424

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 12-4-79 THE SUM OF 5 DOLLARS 00 CTS

TO THE ORDER OF Citizens for the Republic

James A. Johnson CHAIRMAN

SENDER'S NAME AND ADDRESS Robert K Pulsifer
Baltimore

BEFORE CASHING READ NOTICE ON BACK

1:1020:0001:55 4669384248

Commission Ex. No. 23
July 30, 1980
SDA

4/2/80
(date)

I contributed $ 150 -- to Citizens for LaRouche on
(amount)

12/1/79 .
(date) This contribution was from my own personal

funds and not drawn on an incorporated account.

signed

(signature)

(address)

(City) (State)

ERNEST PURSIFER

Commission Exhibit 24
July 30 1980
SDA

ATTACHMENT #5
page 3

3

P.O. Box 976, Radio City Station
New York, N.Y. 10019
#(212) 247-8227

Name of contributor Anne G Taylor
Address 1304 Saint St
City Balt State Md. Zip
Amt. of contribution 150.—
Contributor's occupation retired.
Place of employment
Address
CFL Representative DHF/JR

Taylor 1/23/80 01

AMERICAN EXPRESS MONEY ORDER 23-1/1020

55-466,338,411

11126

PAY THE SUM OF
NOT GOOD OVER $200

DATE 1/23 19 80 ONE HUNDRED FIFTY DOLLARS 00 CTS

TO THE ORDER OF Citizens for Jackson Gerald Cohen CHAIRMAN

Anne G Taylor 1304 St. St Balt. Md
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

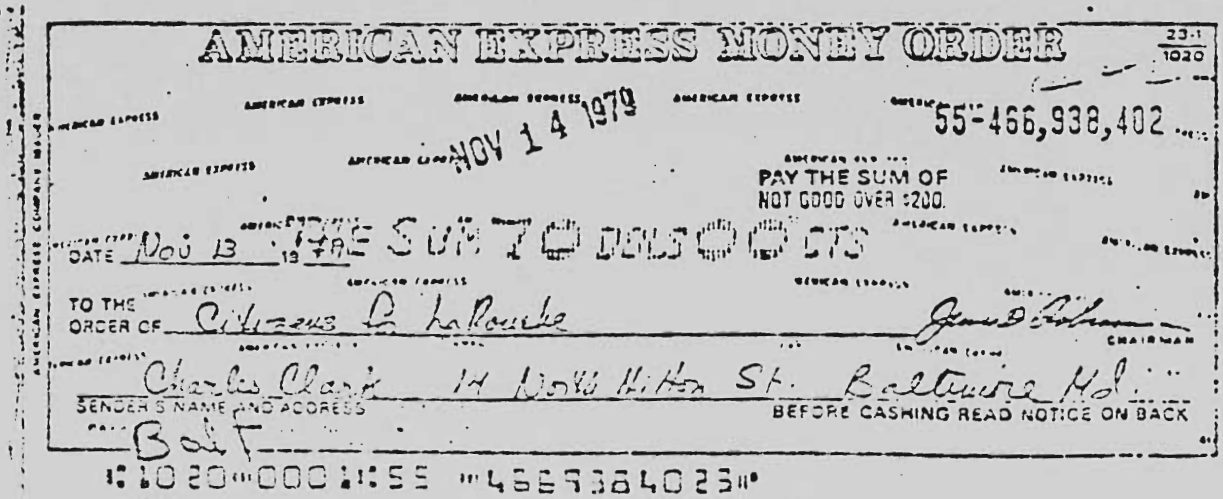
⑈1020⑈000111155⑈466938411③⑈

25

ATTACHMENT #5

page 4

Commission Ex. No. 25
July 30 1980
SDA



AMERICAN EXPRESS MONEY ORDER

23-1
1020

55-466,938,402

NOV 14 1979

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 13 19 78 FIVE SUM TO DOLLARS 00 CTS

TO THE ORDER OF Citizens Co La Roche

CHAIRMAN

Charles Clark 14 Dolly Madison St. Baltimore Md.
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Balt

⑈1020⑈000⑆55⑈466938402⑈

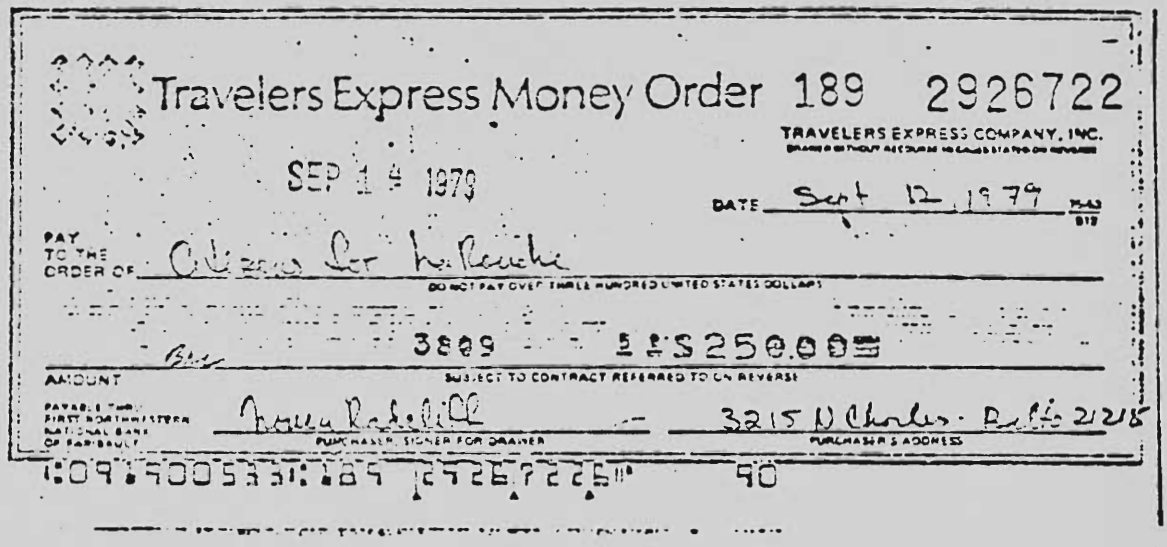
T

4

V

Commission Ex. No. 24
July 30, 1980
SDA

ATTACHMENT #2
page 1



Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for Rangel

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 $250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF MINNEAPOLIS

[illegible] PURCHASER, SIGNER FOR DRAWER

3215 N Charles - Balto 21218 PURCHASER'S ADDRESS

:0918005331:189 2926722" 90

Commission Ex. No. 27
July 30, 1980
SDA

_____
(date)

I contributed $ 70 ⁰⁰ to Citizens for LaRouche on
(amount)

11/10/79 . This contribution was from my own personal
(date)

funds and not drawn on an incorporated account.

signed

Charles Clark
(signature)

[redacted]
(address)

[redacted]
(City) (State)

CHARLES CLARK

Commission Ex. No. 28
July 30, 1980
SDA

2 28 80
(date)

I contributed $ 250.00 (amount) to Citizens for LaRouche on

9/10/79 (date). This contribution was from my own personal

funds and not drawn on an incorporated account.

signed

Nancy Radcliffe
(signature)

[illegible] St. [illegible]
(address)

[illegible] MD [illegible]
(City) (State)

NANCY RADCLIFFE

Commission Ex. No. 29
July 30, 1980
SDA

ATTACHMENT #5
page 9

AMERICAN EXPRESS MONEY ORDER 23-1 1020

11/21 55-466,938,409

PAY THE SUM OF
NOT GOOD OVER $200

DATE 3/17 19 THE SUM 45 DOLLARS 00 CTS

TO THE ORDER OF [illegible]

CHAIRMAN

SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

AMERICAN EXPRESS COMPANY ISSUER

⑈1020⑈ ⑆000155⑆ 466938409⑈

Commission Ex. No. 30
July 30, 1980
SDA

ATTACHMENT #5
page 11

CITIZENS FOR LAROUCHE
P.O. Box 976, New York, N.Y. 10019

Name of contributor Constantine Philios
Address Sweet Air Rd
City Baldwin State Md Zip
Amt. of contribution $ 225
(If contribution is $100 or more fill out below)
Occupation iconocographer
Place of employment see above.
Address

1-21-80 1-1
DATE DEPOSIT CODE

FEDERAL EXPRESS MONEY ORDER
119691496 64-79/611

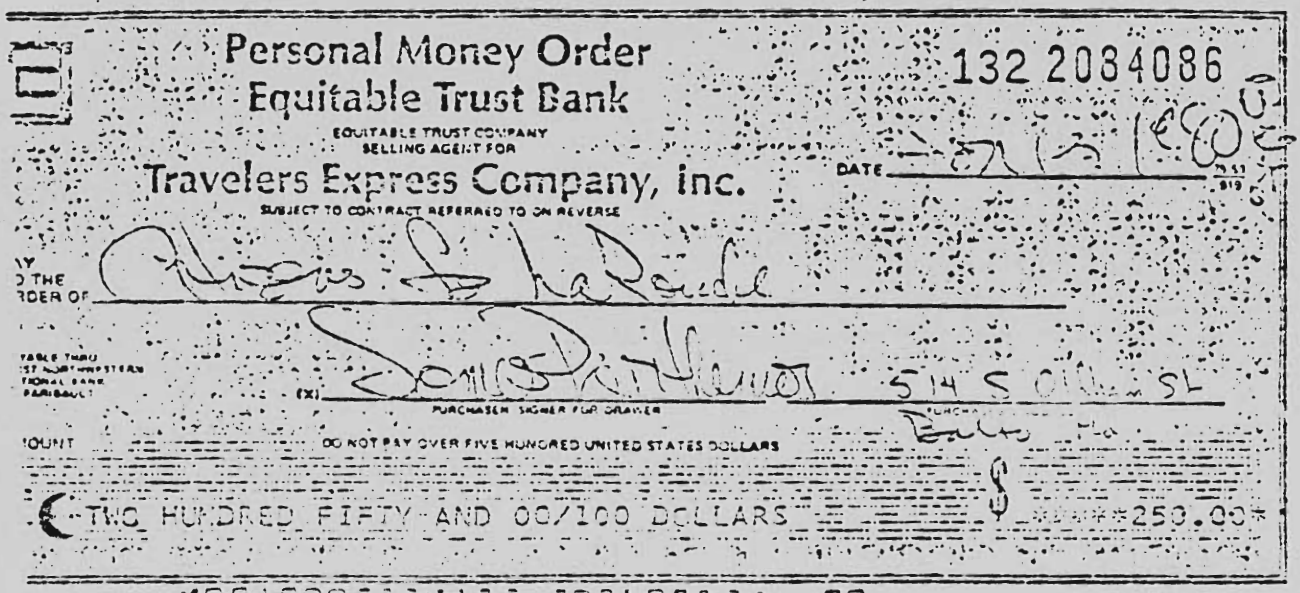
PAY THE SUM OF FEDERAL EXPRESS 225 DOLS 00 CTS
NOT VALID OVER $500.00
PAYABLE TO Citizens for LaRouche
FROM Christine Philios - Constantin Philios
PRESIDENT
FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE
ADDRESS Sweet Air Rd
CITY Baldwin STATE Md ZIP CODE DATE
:0611001901: 119691496# 74

1-21-80 1-1
DATE DEPOSIT CODE

Commission Ex. No. 31
July 30, 1980
SDA

ATTACHMENT #5
page 10

DATE 1-15-80 DEPOSIT CODE 1-2



Personal Money Order
Equitable Trust Bank
EQUITABLE TRUST COMPANY
SELLING AGENT FOR
Travelers Express Company, Inc.
SUBJECT TO CONTRACT REFERRED TO ON REVERSE

132 2084086

DATE 1-15-80

PAY TO THE ORDER OF Charles A. LaPorte

(X) Donald Kirkland 514 S Old Dixie Sl
PURCHASER SIGNER FOR DRAWER

PURCHASED AT Eulless Fla

DO NOT PAY OVER FIVE HUNDRED UNITED STATES DOLLARS

TWO HUNDRED FIFTY AND 00/100 DOLLARS $ ****250.00*

TABLE THRU 1ST NORTHWESTERN NATIONAL BANK FAIRBAULT

AMOUNT

:0916000333:183 2084086#* 90

DATE 1-15-80 DEPOSIT CODE 1-2

Commission Ex. No. 32
July 30, 1980
SDR

ATTACHMENT #3, page 6

DATE 1-23-80 DEPOSIT CODE 1-2

FEDERAL EXPRESS MONEY ORDER

119851803 64-79/611

PAY THE SUM OF 50-008 400.00

PAYABLE TO Citizens for LaRouche NOT VALID OVER $500.00

FROM Belinda F. deGrazia

ADDRESS 310 Ridgemede Rd

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

:081100790: 119851803" 74

Sample 5.03

DATE 1-23-80 DEPOSIT CODE 1-2

Issued 22 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22 1980.
(date)

signed

[signature]

DATE (DEPOSIT CODE

310 Ridgemede Road
(address)

Commission & No. 33
5. July 30, 1980
SDR

DATE 1-23-80 DEPOSIT CODE 1-2

ATTACHMENT #5, page 5

FEDERAL EXPRESS MONEY ORDER

119851804 64-79/611

PAY THE SUM OF 50-008 $100.00

PAYABLE TO Citizens For LaRouche
MAIL NOTICE ON BACK

NOT VALID OVER $500.00

FROM Steven C. Warm
PURCHASER SIGNATURE

PRESIDENT

ADDRESS 310 Ridgewood Rd

FEDERAL EXPRESS SERVICES CORP.
DRAWER - DRAWEE

CITY Bath STATE Md ZIP CODE 21210 DATE 1-22-80

⑆061100790⑆ 119851804⑈ 74

DATE 1-23-80 DEPOSIT CODE 1-2

January 22 1980
(date)

I contributed $100.00 to Citizens for LaRouche on

January 22 1980.
(date)

signed

[redacted]
(signature)

DATE _____ DEPOSIT CODE _____

[redacted]
(address)

[redacted]

Commission E No. 19
July 30, 1980
SDA

ATTACHMENT #1
page 2

Pay to the order of Citizens for La Bouche.

[signature]

CITIZENS FOR La BOUCHE
CITIBANK

Date 1/23/80

Code 1-3

Commission Ex No 18
July 30, 1980
SDA

ATTACHMENT #1
page 1

Date 1/23/80 Code 1-3 5-02

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

CK NO.	DATE	ACCOUNT	AMOUNT
75	01/22/30.		$*1,009.58 ← PAY

BALTIMORE, MARYLAND NO. 4
NOT VALID FOR MORE THAN $10,000.00

DAVID SANDERS

L. A. Wall

Commission Ex. No. 13
July 30, 1980
SDA

ATTACHMENT #5

page 2

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1160

Pay to the order of [illegible] $ 15.00

[illegible] Dollars

7-16
520

maryland national bank
BALTIMORE, MARYLAND 408

Memo

Debra J. Hanania

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

997

Pay to the order of [illegible] $

Dollars

7-16
520

maryland national bank
BALTIMORE, MARYLAND 408

Memo

Commission Ex No 12
July 30, 1980
SDA

ATTACHMENT #5

page 1

DR. DEBRA J. HANANIA
4004 Linkwood Road
Baltimore, Maryland 21210

1077

6 August 19 77

7-16
520

Pay to the order of Citizens for LaRouche $ 50.00

Fifty and ++/100 Dollars

maryland national bank
BALTIMORE, MARYLAND 408

Memo Bail

Debra J. Hanania

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO 999

7-16
520

4 Nov 19 79

Pay to the order of Citizens for LaRouche $ 40.00

Forty 62/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

GORE BROTHERS REPORTING COMPANY
225 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

3040372905

RECEIVED
80 OCT 3 A9:22

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

Attn: Robert Bogin, Esq.

GCC# 3565

912021

BEFORE THE FEDERAL EXCHANGE COMMISSION

IN RE: *

MUR 1158 *

* * * * * * *

UNITED STATES COURT HOUSE

BALTIMORE, MARYLAND

JULY 30, 1980

APPEARANCES:

ROBERT BOGIN, ESQUIRE
HAL PONDER, ESQUIRE
MICHAEL DYMERSKY, ESQUIRE
On behalf of the Federal Exchange Commission

PETER PARKER, ESQUIRE
On behalf of Debra Hanania Freeman

Reported by:

Susan D. Ashe, RPR

GORE BROTHERS REPORTING CO.
225 E. REDWOOD ST.
BALTIMORE, MARYLAND 21202
837 - 3027

I N D E X

WITNESS: PAGE:

Debra Hanania Freeman 3

E X H I B I T S

NUMBER:

1	Check Sample	7
2	Check Sample	8
3	Check Sample	9
4	Contributor-Confirmation Form	10
5	Money Order Sample	13
6	Money Order Sample	14
7	Money Order Sample	15
8	Money Order Sample	15
9	Money Order Sample	15
10	Money Order Sample	16
11	Endorsement and Address Sample II	18
12	Check Photocopy	70
13	Check Photocopy	70
14	Travelers Express Money Order Photocopy	72
15	Federal Express Money Order Photocopy	75
16	Contributor-Confirmation Form	85
17	Contributor-Confirmation Form	85
18	Household Finance Bill Photocopy	86
19	Endorsement of Check Photocopy	87
20	Contributor-Confirmation Form	89
21	American Express Money Order Photocopy	91
22	American Express Money Order Photocopy	92
23	Contributor-Confirmation Form	95
24	American Express Money Order Photocopy	96
25	American Express Money Order Photocopy	97
26	Travelers Express Money Order Photocopy	97
27	Contributor-Confirmation Form	99
28	Contributor-Confirmation Form	104
29	American Express Money Order Photocopy	105
30	Contributor Form and Federal Express Money Order	106
31	Money Order Photocopy	107
32 and 33	Federal Express Money Order Photocopies	107

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

STIPULATIONS

It is stipulated and and agreed by and between counsel for the respective parties that the filing of this deposition is hereby waived.

- - - - - - - - - - - - - - -

DEBRA HANANIA FREEMAN,

called for examination, having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION BY MR. BOGIN:

Q Would you please give us your name for the record?

A Debra Hanania Freeman.

Q Are you sometimes known as Debra Hanania?

A Yes.

Q Or Debra Freeman?

A Yes.

Q And Debra Hanania Freeman?

A Right.

Q Is Freeman your married name?

A Yes, it is.

Q Where doyou live?

A 4004 Linkwood Road in Baltimore.

Q How long have you lived at that address?

A Oh, I think about three years.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q And what is your occupation?

A I'm a teacher.

Q Where do you teach?

A It's Stanley Caplan Education Center.

Q Is Stanley Caplan where they teach for law board and --

A Right.

Q -- med boards?

A Right.

Q All right. How long have you been working for Stanley Caplan?

A About two years.

Q How many hours a week do you work?

A It varies, depending on the season.

Q In 1979 how many hours would you say you worked, remember?

A Oh,'79, I think I taught eight courses and each course is about eight classes, and each class is about four hours long. You can multiply it out yourself. I really don't know how many hours I worked.

Q And do you get paid by the hour?

A Yes.

Q Do you know whatyou get paid by the hour?

A Yes. I do.

Q What is that amount?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Do I have to answer you in terms of my own personal income? I don't really see how it's relevant to this.

MR. PARKER: I'm not sure about the relevance either, to tell you the truth. Is there some reason for asking her?

MR. BOGIN: I'm interested in knowing the income, get an income profile.

MR. PARKER: I think it's a reasonable question in light of the fact that they're apparently attempting to determine how much money is being contributed here.

THE WITNESS: Okay, I make about $15 an hour and then I'm paid $5 to $10 depending on the course, per hour for preparation for each class.

Q Oh, I see. Can you give me an approximate amount that you made from Stanley Caplan in 1979?

A 1979 -- I really don't know exactly. I'd have to check my records. I'd have to check my tax records but I can furnish you the information.

Q All right. Doyou have any other source of income besides teaching at Stanley Caplan?

A Yes. I do consulting work on occasion and I do some free-lance writing.

Q Could you approximate how much money you grossed last year in terms of income?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 746

A Total.

Q Total, 1979.

A I would say probably somewhere between -- somewhere in the area of ten to fifteen thousand.

Q And what is your husband's name?

A Lawrence Freeman.

Q And is he employed?

A He -- well, he does consulting work. He's self-employed really.

Q And approximately to the best of your knowledge, how much money did he gross last year in 1979?

A I have absolutely no idea.

Q Do you file income tax returns?

A Um-hum.

Q Do you file a joint return?

A Yes.

Q Have you filed your return for 1979?

A I don't know. I think we may have filed an extension.

Q Okay. At this time I am going to ask you to give us samples of your handwriting.

A Okay.

Q I have various forms here. I'm going to hand you a form and dictate what I'd like you to write and then mark it as an exhibit.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Okay.

Q I'll start off with a check sample. It's a copy of a blank check. It has sample written across it.

MR. PONDER: Excuse me, just a minute. I think you want a tag under it.

MR. PARKER: Here, she can write on the back of that.

Q And I'd like you to write that check out as if you were writing it to Citizens for LaRouce in the sum of $400 and sign it.

A Do you want all this stuff filled out?

Q Yes, put the date of August 6, '77.

A Okay. Telephone number and stuff like that?

Q Please.

MR. BOGIN: I'm going to give this to the Court Reporter. Mark it Freeman Exhibit 1, and Exhibit 1 will be that sample that you just filled out of this sample check.

MR. PARKER: Will you furnish us a copy of that?

MR. BOGIN: I'll furnish you a copy at the time we get the deposition back.

MR. PONDER: These will be attached to the deposition, so you will get copies.

(Whereupon, Freeman Deposition Exhibit No. 1 was marked for identification.)

Q I have another check sample, the same as the

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

one you just filled out. I'd like you to fill it out again to Citizens for LaRouche.

MR. PARKER: Which is this one, same one?

Q This is the same form and at this time I'd like you to fill it out for a different amount. Fill it out for $15 and date it November 21st, '79.

A I'm sorry, what did you say?

Q The date would be November 21st, '79.

A Okay. Sign the same way?

Q Yes. How do you normally sign your checks?

A Well, it depends. I have recently changed my account to Debra Hanania Freeman. I previously wasn't using my married name.

MR.BOGIN: Okay. I'd like to have this latest check sample marked Deposition Exhibit 2 which would be the handwriting sample, paid to the Order of Citizens for LaRouche for $15.

(Whereupon, Exhibit No. 2 was marked for identification.)

MR. PARKER: You have quite a stack here. She's not going to give innumerable handwriting samples, I can tell you.

MR. BOGIN: There will be quite a few --

MR. PARKER: Well, you're not entitled to quite a few. I mean, you know, she might do one more here but

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

that's going to be the end of that. Otherwise you'll have to get a court order.

MR. PONDER: I think we better go off the record a minute.

(There was a discussion held off the record.)

BY MR. BOGIN:

Q I have handed you a check sample, another one marked, check sample, and I'd like you to fill it out this time but instead of signing your name Debra Hanania Freeman would you please sign it Debra J. Hanania and it could be out to Citizens for LaRouche and this time make it out for $45.

(There was a discussion off the record.)

MR. BOGIN: Thank you. I have here a check sample, pay to the order of Citizens for LaRouche for $45 signed by Debra J. Hanania and I'd like to have this marked Commission Exhibit No. 3.

(Whereupon, Commission Exhibit No. 3 was marked.)

MR. BOGIN: I have a correction for the record. On the first exhibit I have it marked down Freeman Exhibit No. 1. I'd like that changed to Commission Exhibit No. 1.

(Whereupon, Freeman deposition Exhibit No. 1 was changed to Commission Exhibit No. 1.)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q I have in my hand a different sample form. It's basically a contributor-confirmation form and I'd like to give this to you and dictate certain information I'd like you to write on the form. Where it says date, it would be January 23rd, 1980.

(There was a discussion held off the record.)

A September 23, 1980.

Q "I contributed $220 on January 15th, 1980," and I'd like you to sign that Harold H. Harrison, M.D. 3900 North Charles Street, Baltimore, Maryland.

That's fine. Thank you.

MR. BOGIN: I'd like to mark this Commission Exhibit No. 4.

(Whereupon, Commission Exhibit No. 4 was marked for identification)

Q Do you know a Dr. Harrison?

A Not personally.

MR. PARKER: What did you say?

THE WITNESS: Not personally.

(There was a discussion held off the record.)

MR. BOGIN: Back on the record, counsel has objected before about the exhaustive nature of the handwriting samples. I'd like to put on the record that in order to have these handwriting samples properly analyzed we are going to need to have five identical copies of

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

each item that has to be analyzed.

To do that we have about eight to ten items which, times five, is going to be 40 to 50 samples that we are going to have.

I understand that it is tedious and we recognize this, but it it necessary.

MR. PARKER: Well, let me ask you this. Let's do the eight to ten. You can make photocopies.

MR. BOGIN: No. For purposes of analysis we cannot make photocopies. We need originals.

MR. PARKER: I'm not saying we won't do it, but let's take the deposition. Do your eight to ten items, at least, in the singular form and then we'll argue about it after the deposition is over. Maybe we'll do it. See what happens.

MR. BOGIN: I'm not sure I understand you. We are going to proceed with the handwriting samples and let's get them over with.

MR. PARKER: You've got eight to ten, is that what you're telling me, and then you need five copies of each? I mean, is that what you're saying?

MR. BOGIN: Five originals --

MR. PARKER: Okay, well, we've already done four. Let's get the four or five or six, or whatever you've got.

MR. PONDER: I'd like to accommodate the

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

procedure you're suggesting, but we can't do it that way. We need to take five samples of the particular one at the time that -- I mean, you're suggesting a procedure to us. We have to determine what procedure we want to go by.

MR. PARKER: I know, but what I'm saying is so far we've only made one copy each of these things. You now want to make four additional copies.

MR. PONDER: Um-hum.

MR. PARKER: Well, I'm saying that if Mrs. Freeman is going to do that, she's going to do it at the end of this deposition when I'm not sitting here getting paid $100 an hour, I mean, because that's going to take a while to fill out 40 forms. Maybe she'll be glad to do it, fine. You're not losing anything by that.

But what you're saying is that she -- you take this and you take four additional pages and fill it out the same way, right, is that what you're saying?

MR. BOGIN: I think we'll do a couple more, a few more of these and then we'll get on to the questioning and then if you'd like to leave and Ms. Hanania would like to stay and fill out more of the same we can understand that.

MR. PARKER: Really, I mean I'm being very reasonable here because I honestly don't think you're entitled to all these things, you know. I mean I seriously

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

doubt if you're entitled to any handwriting samples. Maybe you are, but you know, we just want to get the deposition over.

Q Okay. I have here a sample money order that is written sample across it and there's a broad black line. I'd like you to fill out the bottom half of that money order and it's paid to the order of Citizens for LaRouche and where it says sender, I'd like you to put the signature Ann R. Taylor and the address, 1304 John Street --

A John?

Q John -- Baltimore, Maryland and then where it says authorized signature I'd like you to put Ms. Ann R. Taylor's signature again down there and date it.

A What date do you want?

Q Today's date would be fine.

A The 30th?

Q July 30th.

MR. BOGIN: I'd like this marked Commission Exhibit No. 5. It's the money order sample filled out by Mrs. Freeman that is payable to Citizens for LaRouche and it's marked Ann R. Taylor.

(Whereupon, Commission Exhibit 5 was marked for identification)

Q I have another money-order sample that I would like you to fill out payable to Citizens for LaRouche.

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

A Bottom half again?

Q Bottom half, please.

The sender this time would be Nancy Radcliffe, 3215 North Charles Street, Baltimore, but B-a-l-t-o, 21215 and date it January 12, 1979 and sign Nancy Radcliffe's name on the bottom.

A January 12th, '79?

Q Right.

MR. BOGIN: I'd like to mark money order payable to Citizens for LaRouche, sender Nancy Radcliffe, as Commission Exhibit No. 6.

(Whereupon, Commission Exhibit 6 was marked for identification.)

Q I have another sample money order that has to be filled down at the bottom, payable to Citizens for LaRouche, the sender is Kevin Salisbury, 1909 North Forest Park Avenue.

A 1909?

Q North Forest Park.

A Avenue?

Q Avenue. Baltimore, B-a-l-t-o, Maryland, M-d, and the date would be January 12th, 1979, signed by Kevin Salisbury.

Thank you. I have another money order sample --

MR. PARKER: Mine's dated 1980.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q All right, excuse me. I'm going to mark this last money order sample Citizens for LaRouche, sender Kevin Salisbury as Commission Exhibit No. 7.

(Whereupon, Commission Exhibit No. 7 was marked for identification.)

Q I have another money order sample. This time it should be paid to Citizens for LaRouche. Sender would be David Sanders, and just sign it David Sanders on the bottom with today's date, please.

MR. BOGIN: I have money-order sample payable to Citizens for LaRouche, sender David Sanders, which should be marked Commission Exhibit No. 8.

(Whereupon, Commission Exhibit No. 8 was marked for identification.)

Q This is the last one of this series. This would be payable once again to Citizens for LaRouche, sender Charles Clark, 14 North Hilton Street, Baltimore, Maryland, and sign it Charles Clark's name.

MR. BOGIN: I have money order samples, handwriting samples, from Mrs. Freeman paid to the order of Citizens for LaRouche, sender Charles Clark. Mark it Commissioner Exhibit No. 9.

(Whereupon, Commission Exhibit No. 9 was marked for identification.)

Q I remembered one more actually. This is the last

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

one for this series. It will be Citizens for LaRouche. Ernest Pulsifer.

MR. PARKER: Earnst?

MR. PONDER: Ernest.

Q Ernest; and while I look up the address will you sign it Ernest Pulsifer.

MR. PARKER: How about 209 Second Avenue.

Q Okay.

A Is that what you want me to write.

Q Hold on just a second.

MR. PARKER: The money order itself does not have an address on it.

Q Okay. Well, let's leave it without an address then.

A In Baltimore.

Q Yes, put Baltimore, Maryland.

MR. BOGIN: Okay. I have money order sample, handwriting sample, Citizens for LaRouche, sender Ernest Pulsifer; and that would be Commission Exhibit No. 10.

(Whereupon, Commission Exhibit 10 was marked for identification.)

MR. BOGIN: At this stage I am going to postpone the rest of the money order samples. We'll go through the deposition and then if Mr. Parker cares to leave at that time, Mrs. Freeman can fill out the rest of the handwriting

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

samples.

There's one more sample, though, before I do that. It's a different type.

Q I'm going to give you a blank endorsement and address form and I'm going to giveyou a series of signatures, dictate a series of names which I'd like you to put down their signatures.

MR. BOGIN: Off the record, please.

(There was a discussion held off the record.)

Q In order to expedite this for everybody's case, I have given you an endorsement and address blank and I'd like you to write the following signatures down: Mary Cavanaugh, and then space it a little bit and underneath that one put Steven Warm, Belinda F. deGrazia, Robert A. Robinson --

MR. PARKER: Robert A?

MR. BOGIN: That's correct.

Q Edward St. John, Ruston Ghandi --

A What?

Q Ruston Ghandi, R-u-s-t-o-n, G-h-a-n-d-i, Arthur Murphy, Constantine Philiso, P-h-i-l-i-s-o.

A P-h-i-l--

Q -i-s-o.

MR. POWDER: i-L-s, isn't it?

MR. BOGIN: I have it this way.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PONDER: No, that's not right. It's i-o-s.

Q Okay. Then, underneath that then write it i-o-s. Sign it as --

A P-h-i-l-i-o-s?

Q P-h-i-l-i-o-s. Thank you.

MR. PARKER: Let's take a look at it.

MR. BOGIN: I was going to mark it as an exhibit. I have here an endorsement and address that contains one, two, three, four, five, six, seven, eight signatures of various individuals that have been filled out as a handwriting sample and I'd like to mark it Commission Exhibit No. 11.

(Whereupon, Commission Exhibit No. 11 was marked for identification.)

MR. BOGIN: Okay. Now, at this time we are done with the first stage of the handwriting samples and we'll get on with the deposition if there's no objection.

MR. PARKER: Fine.

BY MR. BOGIN:

Q Have you ever run for elected office?

A Yes.

Q When was that?

A 1978.

Q And what office were you seeking?

PENNSAUKEN, BAYONNE, N.J. 07002 - FORM 740

A House of Representatives.

Q And what party were you affiliated with?

A I was an independent.

Q An independent? Are you familiar with the individual named Linden LaRouche?

A Yes.

Q How are you familiar with him?

A I'm not sure I understand what you are asking me. You mean -- do you want me to identify how do I know him?

Q That's right.

A Okay. He's the Democrat running for President.

Q Have you ever met the man?

A Yes.

Q When was the first time you met him?

A Ten years ago.

Q Do you recall the occasion?

A I think he was probably teaching a class that I attended.

Q Where would the class have been?

A I can't remember whether it was Columbia University or the State University of New York, at Stoney Park.

Q Were you a student of his?

A Yes.

Q How many times would you say that you have met

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

him personally?

A Hundreds of times.

Q Hundreds of times? Are you a campaign worker for his try for the Presidency?

A I'm a volunteer.

Q You're a volunteer?

A (Witness indicates yes.)

Q Do you volunteer mostly in the Baltimore, Maryland area?

A Yes.

Q Would you consider yourself the head of the Baltimore area volunteers?

A I might but no one else does.

Q Does Mr. LaRouche have campaign headquarters down in Baltimore?

A No, he doesn't.

Q Who else works for Mr. LaRouche as a volunteer that you are familiar with in this area?

A My husband.

Q Is that Lawrence Freeman?

A Yes. I don't know. Do you want me to just name who does volunteer work for him?

Q Yes, that you know.

A John Acher, Rochelle Acher, Nancy Radcliffe, Gerald Belski, Belinda deGrazia -- I mean there are an awful

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

lot of people who do volunteer work for him. I couldn't possibly name all of them.

Q Is there anybody who's paid to do that work for Linden LaRouche in --

A In Baltimore?

Q -- in the Baltimore area?

A Not that I know of.

Q Are you familiar with a group called Citizens for LaRouche?

A Yes.

Q Do you know anybody who works for Citizens for LaRouche?

A Do you mean paid?

Q Paid.

A Not that I know of.

Q Do you know people who volunteer for Citizens for LaRouche?

A Yes.

Q What is Citizens for LaRouche?

A I think it's the principal campaigning company of Linden LaRouche.

Q What are your responsibilities as a volunteer? What do you do as a volunteer?

A It varies. I do some office work, you know, fund-raising-type activity like selling tickets for a fund-

PENNAG CO. BAYONNE, N.J. 07002 - FORM 746

raiser, mailings, whatever has to be done.

Q You say you do office work, do you work out of an office?

A No. We do things in various people's homes.

Q Is there one central location where most of the volunteers get together to do work?

A Not really.

Q Are there meetings of volunteers for LaRouche?

A Well, there are fund-raiser type things and video tape showings and stuff like that and that's volunteers, but also, you know, people who aren't volunteers like to make volunteers.

Q Okay. Let's talk about a typical fund-raiser. Okay. Who makes the suggestion to have a fund-raiser?

A New York; New York Headquarters.

Q New York Headquarters; could you identify a person in New York --

A Sure.

Q -- who gives the idea for a fund-raiser?

A Felice Gelman.

Q And who is Felice Gelman?

A I think she's Linden's Treasurer.

Q Treasurer of Citizens for LaRouche?

A Yes.

Q And she'll get on the telephone?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q And call you?

A She calls my husband. She calls me. She'll call any number of people. She might call someone in Washington.

Q Do you and your husband live at the same address?

A Sure.

Q So they can telephone your house and talk to either you or to your husband?

A Yes.

Q Yes; and then could you give me a typical dialogue that you might have with Ms. Gelman for a fund-raiser?

A Yes. Felice will say, "We need money. Let's have a fund-raiser," and we will say, "Okay. When do you want to have it? How much do you want to spend? How much should we charge for tickets?"

She will then send us printed material, tickets. We usually reserve a hotel. They send us a check to pay for the hotel.

Q They being Citizens for LaRouche?

A Right; and that's about it and we proceed to try to sell tickets.

Q How do you sell tickets?

A I'm not sure I understand.

Q Do you stand on a street-corner or do you --

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A No, no.

Q What's the process whereby you sell tickets to these fund-raisers?

A Well, generally we call people we think might be interested in purchasing tickets. Some of them are personal friends, people we work with. Sometimes their names have been suggested to us by other people. That's pretty much how we do it.

Q Is that through telephone or --

A Yes, through telephone, word of mouth.

Q Through mailings?

A Sometimes, yes.

Q Can you remember the most recent fund-raiser that you participated in?

A Let me think, we had a whole bunch of them right around New Hampshire primary. I'm trying -- I think we had one in March; but to tell you the truth, I really can't remember.

Q Well, let's talk about the one February or March.

A Sure.

Q Now, what would be the typical price for a ticket?

A $100. That's for a single ticket.

Q For a single ticket?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Witness indicates yes.

Q And in those ones in February, March, what would be about the average number of tickets sold?

A Let's see. We had a big one on December 9th in Washington.

Q December 9th?

A That was between -- that was a joint between us and Washington. We must have sold, oh, I would say about 4500 tickets for that.

Q And did you, yourself, personally sell any tickets?

A Oh, sure.

Q And you would find somebody who was interested in a ticket and they would give you money for the ticket?

A Money, checks; sometimes we'd give people tickets and, you know, they would give us money later. Sometimes they would come in the mail.

Q And did you oftentimes receive cash for these tickets?

A On occasion.

Q And checks?

A Yes.

Q And money orders?

A Yes.

Q Any other form of payment?

A No.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q And usually it would be for $100, that would be the --

A Well, not always. Sometimes if someone were to buy a number of tickets we would give it to him at a lower rate. Sometimes we would sell a group ticket for $250. It really, you know, it really depended on the circumstances.

Q And when you collected the money where did it go from there? After you received it, could you tell me what happens to that money?

A Yes; we mail it to New York.

Q To Felice Gelman?

A Well, we mailed it to Citizens for LaRouche to Felice's attention.

Q To the committee?

A (Witness indicates yes.)

Q So sometimes you have quite a bit of cash. Do you put that in the envelope, too?

A No. We buy money orders for it.

Q You buy money orders with the --

A Well, sure, because you can't send cash.

Q No. I understand that. So, what you do is when you receive cash you go buy money orders with that?

A Well, it depends. If I get -- let's say I sell someone a ticket and they give me a hundred dollars.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

I will ask that person if it's okay if we get a money order in their name and I'll ask them to sign a statement. If they sign a statement, I'll buy a money order. That's one thing.

And there's another kind of money order you buy as well which is at a fund-raiser itself or a video showing. Sometimes you pass the hat around and everybody will make a contribution. We don't know who -- these are small contributions and we buy one big money order for that whole thing. Generally everything that goes to New York is either check or money order.

Q Okay. You mentioned you had them sign a statement.

A Yes.

Q What kind of statement?

A The kind that I just filled out for you actually. This thing here.

Q Saying that they made a contribution?

A Either they fill it out there, you know, or we try to get them to fill it out right on the spot or what will happen is sometimes we don't get them to fill it out right on the spot and we'll mail it to them and if it's returned or sometimes New York handles it. You know, they just do it directly.

Q Okay. Do you ever deposit any of the money or checks at a local bank account?

A No, I don't have an account.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q So you send all your receipts up to Baltimore in the form that they --

MR.PARKER: Up to New York.

Q -- up to New York in the form in which you received except for money which then you oftentimes put into money orders and send them? So you never send cash up to New York?

A No, we don't.

Q Okay. I asked you before if you knew a Dr. Harold Harrison. Do you?

A I don't know him personally. I think I may have met him once at a fund-raiser but I'm really not -- I think I met him once.

Q Okay. Are you aware that he made a contribution to Citizens for LaRouche for $250?

A Yes.

Q How are you aware of that?

A I'm aware of it because I purchased a check for it.

Q But you never left?

A No. In other words, what will happen on any given day is that I may either actually get money from someone, right, from Ernest Pulsifer, go and buy a money order for Ernest Pulsifer. What might also happen is, just as part of being in the office, someone might ask me, you

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

know, do me a favor. Go buy a money order for so and so, which I do.

Q Well, describe how you obtain the money for --

A I purchased a cashier's check.

Q You went to --

A I went to the bank with $250.

Q Do you remember which bank?

A I think -- well the bank closest to where -- probably Maryland National Bank, more than anything else.

Q Where is that close to?

A Well, it's close to -- you see, my office at Caplan --

MR. PARKER: If you want to refresh your memory, there's a copy.

A There you go, Maryland National Bank. I mean it's close to any number of different places. Maryland has more branches than any other bank, so, you know, I tend to buy a lot of money orders and checks and --

Q Do you have a savings account at Maryland National Bank?

A Sure.

Q Do you have a checking account there?

A Yes.

Q So you went to Maryland National Bank and you purchased a money order?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: Cashier's check.

A Cashier's check.

Q For how much was the cashier's check?

A $250.

Q And what was printed on the cashier's check when you bought it?

A Customer request by Debra Hanania Freeman.

Q And then subsequent to that didyou type anything on that check?

A I didn't type anything on it, but I can see that there was something else typed on it to identify who the contributor was.

Q Okay. Now, did Dr. Harrison give you money to purchase this check?

A He didn't give it to me personally.

Q Who did he give it to?

A I honestly don't know.

Q What's your understanding of how Dr. Harrison gave the $250?

A Do you mean in what form?

Q Yes, in what form and to whom?

A I think it was cash, and I honestly don't know to whom.

Q So, who instructed you to pick up a check, purchase a cashier's check, for $250?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I don't remember.

Q Could you give me the possibilities of who it might have been?

A Could have been anyone who, you know, volunteer which might have asked me to do it and it could have been that nobody asked me to do it. I mean I just do it as a matter of routine.

Q Right. Now, how would you know to purchase a cashier's check for $250?

A Well, what happens is that we have these -- I actually should have brought one -- we have these blue cards which are like pledge cards and what it will say on the cards, it has Citizens for LaRouche and a local address and it says, "Enclosed is my contribution for --" you know, and it says the amounts. Sometimes there's a check attached to it. Sometimes there will be money attached to it and that's you know, that generally how the thing is done. It's a pretty routine procedure.

Q Where are these blue cards kept?

A All over the place, my trunk. They're just, you know --

Q You don't have a local office in --

A No, we don't have an office.

Q Have you ever heard of New Solidary?

A Sure.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 240

Q Do they have an office in town?

A I don't know if it's actually their office. I know campaign publications, which is a distributor for New Solidary and a number of other publications, does have an office.

Q Do volunteers for LaRouche oftentimes meet at that office?

A They don't meet there, no.

Q Do they do work from that office for the campaign?

A Some of them do.

Q Is it possible some of those blue cards could be in that office?

A It's possible.

Q Do you know the location of that office?

A Yes. It's up in the Medical Arts Building, which is the corner of Read and Cathedral Street.

Q I'd like to go over some old grounds. Do you remember how it came about that you were to purchase a $250 cashier's check for Dr. Harrison?

A What do you mean how?

Q Were you instructed to?

A I just-- I don't remember. I mean I do a lot of these things.

Q On the blue cards, let's say that you did this on your own and you were not told to purchase one and you

PENCAO CO., BAYONNE, N.J. 07002 - FORM 740

looked at a blue card, what information was on that blue card?

A Usually what is on there is the person's name, their address and the amount of money that they gave, sometimes their phone number and if they gave over $100 we asked them to also fill in their occupation and where they work.

Q If you were purchasing the money order, then Mr. Harrison obviously contributed in cash?

A Yes.

Q Is there any particular reason you purchased a cashier's check rather than a money order?

A I think probably because I didn't want to pay for it. You know, if you have an account at a bank and you want to purchase a cashier's check, you don't have to -- it was either that I probably didn't want to pay whatever the fee was for it --

MR. PARKER: The money order fee?

THE WITNESS: Well, this one was a cashier's check. See, if you get a cashier's check you don't have to pay. It's 50 cents or 75 cents. You don't have to pay it. The only other possibility is that sometimes I'm not sure whether the amount is, you know, whether it's for two fifty or not, or sometimes they'll only give you a money order up to a certain sum of money and then they tell you, you

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

know, you should get a cashier's check.

Q If Dr. Harrison contributed in cash, where would the cash have gone?

A What do you mean?

Q Where was the $250 cash that Mr. Harrison contributed?

A I don't understand what you're asking me. I mean, do you mean --

Q Well, you found on the blue card that he contributed $250 cash.

A I'm trying to tell by the date. It might have been done at a fund-raiser. I just -- you know, I really don't know.

MR. PARKER: No. What the question is, is what happened to the $250 cash that Harold Harrison gave you for --

THE WITNESS: I bought a cashier's check with it.

Q You mean you brought the $250 to the bank and said, "Let me have --"

A "I want a cashier's check", right.

Q And was the $250 attached to the pledge card, that blue card?

A I think probably it was either attached to a pledge card or even an envelope that was identified as, you know, being from him.

Q I mean if you have $250 lying with a card, you don't recall where that was kept?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

A No. I mean it was probably handed to me by somebody but I just don't remember.

Q Okay, so --

A I'm not trying to give you a hard time. I just --

Q No, but I'm trying to understand --

A I know, but I don't want to say something to you. I mean, I could think of any number of different ways but I don't want to say something to you that I can't recall because I don't want to be put in that position.

Q But you do recall going to Maryland National Bank on January 14, 1980, is that correct?

A Well, I recall it, after you guys sent me a notice that I was being investigated. I called New York and asked them for copies of these things. So I'm familiar with the thing.

Q So, did you personally go to the bank?

A Yes, I personally did.

Q And handed a teller $250 and asked for a cashier's check?

A Yes.

Q And they wrote it out per customer request, is that it? What does that say?

A It says, "customer request by Debra Hanania Freeman."

Q And then sometime subsequent after the purchase,

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

Q And then sometime subsequent after the purchase, where did you take the check?

A I don't know. I know at some point what I did with the check was, I attached a slip like this to it.

Q Could you describe the slip for the record?

A It's a little receipt pad which says on top Citizens for LaRouche with a New York address. It says, name of contributor, address, city and amount of contribution, and if contribution is $100 or more fill out the occupation, place of employment, and address; and what I will do is I'll fill out a little white thing like that and staple it to the check and I mail it to New York.

Q Okay, and where do you get the information to fill out that slip of paper?

A Well, either I ask the person directly, if I get the money from the person, or I'll ask whoever filled out a blue card for the person. I mean if I don't have a blue card, I try to find out who did it, and sometimes I don't have the information and sometimes I just fill this thing out as best as I can and let New York worry about it.

Q So you filled out a form like that for Harold Harrison?

A Yes.

Q Where did you get the information on that card?

A I must have gotten that from a blue card.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Is it my understanding that you typed something after you purchased the check on a cashier's check?

A No. There's obviously something typed here. I personally didn't type it. I don't know whether this was typed by someone in Baltimore to identify the check or whether it was typed by someone in New York to identify the check.

Q Would you believe it was typed after you purchased the check?

A It says, Dr. Harold Harrison, in parenthesis, to be picked up by CFL rep.

Q Would you read the whole section there as if it were one sentence?

A "Customer request by Debra Hanania Freeman, Dr. Harold Harrison (to be picked up by CFL representative).

Q Okay. Would you read that another way, reading first the top line all the way through and then the second line?

MR. PARKER: That's what she just did.

THE WITNESS: No, I read it as it was typed.

MR. PARKER: Oh.

THE WITNESS: If you read it across this way, it says, "Customer request by," then there's a colon. Then -- well, it's obviously a different typewriter. It says: "Dr. Harold Harrison to be picked up by Debra

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

Hanania Freeman, CFL rep," close parenthesis.

Q Okay. Is that a true statement what you just read?

A Yes.

Q That's --

A That's what it says.

Q Do you know if Dr. Harold Harrison is a customer of the Maryland National Bank?

A Well, that's not what this thing says here.

Q It says, "Customer request: Dr. Harold Harrison."

A Oh, come on. It says, "Customer request by Debra Hanania Freeman". It's obviously two very different typewriters. Only a moron would try to make someone think it's the same.

Q But there's a comma after Freeman, is there not?

A Yes, there is.

Q Well, who would the CFL rep be, Dr. Harold Harrison, or Debra Hanania Freeman?

MR. PARKER: No, it doesn't say that. It says Dr. Harold Harrison (to be picked up by CFL --)

THE WITNESS: Look, I don't really understand this whole thing.

Q When you say this whole thing, what are you talking about?

A This whole parenthetical statement, as a former English teacher, I can tell you is enclosed by everything

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

in these parentheses. This, obviously, is a comma which is then to introduce this other statement.

Q So then --

A I mean that's simple grammar.

Q Well, would you say that you were the CFL rep?

A Sure I was the CFL rep. I'm the one who bought the check. I already told you --

MR. PARKER: But the point is that you don't know what this means where it says, "Dr. Harold Harrison (to be picked up by CFL rep.)" because that wasn't on the check when you sent it to New York, right?

THE WITNESS: That's right.

Q Do you remember who you gave that check to?

A I actually don't remember whether I gave it to someone else to mail it to New York or I mailed it to New York. I generally mail things myself but I, you know.

Q Um-hum. Do you usually send out separate checks or would you wait until you collected a few and send it up at one time?

A Well, we usually get a few every day. You know, there's more than one check which comes in on any given day to a combination of mail and --

Q When you say comes in, is that mailed in?

A Some stuff gets mailed. Some stuff, you know, is just -- which kind of try to collect that at the end of

PENCAD CO., BAYONNE, N.J. 07002 - FORM 700

the day.

Q Where do people mail it to?

A To this address in New York. Either it's mailed to --

Q No, excuse me. When you get it, it comes into the Baltimore --

A Oh, it depends. Sometimes I get mail. Sometimes, you know -- it depends on who solicits the money really.

Q Does it ever get mailed into the campaign of Publications, Inc., headquarters at the Medical Arts Building?

A If there's a volunteer there who has to get it there, what it will be mailed to is the person's name who works there.

Q And then how often do you mail up these checks to New York?

A Every day we try to.

Q Okay. Let me ask you if you know these individuals and you can answer yes or no and then I'll ask you how you know them. Lawrence Freeman?

A Yes.

Q How do you know him?

A I am married to him.

Q Is he a volunteer for Citizens for LaRouche?

A Yes.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Let me ask you a question. These volunteers, are there any official -- are you given any official title, is anybody --

A No.

Q So everybody's a volunteer, there's no head of the volunteers in Maryland?

A I think that -- I think -- I'm not positive what his title is but I think that my husband is some kind of overall coordinator.

Q Not necessarily in Baltimore, or in Baltimore?

A I think his title is Mid-Atlantic Coordinator.

Q Could you tell me what that region consists of?

A I'm not sure. I know that -- I know that most immediately we worked very closely with Washington D.C. because it's such a small area.

Q Who would be the person he would work with most likely in Washington, D.C?

A I don't know. I mean I don't know if there's a legal coordinator. I know there are individuals there, you know, who do things.

Q Could you just name a couple of these --

A Richard Cohen, Stewart Rosenblatt.

Q And your husband is the coordinator for the region so he would have reason to talk with people in Washington --

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q -- to coordinate functions like that fund-raiser that we're talking about?

A Sure, sure.

Q Does he deal with anybody in Delaware?

A I don't think so.

Q New Jersey, is that considered part of his region?

A I don't know.

Q Okay. Well, other than Washington, do you know of any other area that he might have contact with?

A Used to be -- used to be Richmond, Virginia, but we had a couple of people who are volunteers down there, but they've since moved.

Q How does one become a volunteer for Citizens for LaRouche?

A Well, you know, citizens for LaRouche puts out leaflets a lot and you might see someone on a street corner giving out a leaflet or giving out a brochure and people will express interest. Also what happens, and the way that I think we get most of our names, is when LaRouche goes on T.V. There's always a telephone number, you know, and there's thousands of people around the country will call in. They'll be asked to give their name and number and asked if they want to help out. New York usually sends them a mailing.

PENCAD CO. BAYONNE, N.J. 07002 - FORM 740

Q Is that toll-free number in New York?

A I don't know. It's an 800 number. I really don't know where it is.

Q You never answered an 800 phone down here in Maryland?

A No. You know, then we're given those names.

Q But you know Mr. LaRouche personally?

A Yes.

Q All right. Did he say to you,"Debra, I'd like you to, you know, help me out with my campaign down in Maryland"? Has he asked you to do --

A No, he's not the one who asked me.

Q Felice?

A Felice asked me.

Q Well, how did she come to you and when did she come to you?

A Well, you see, I worked for Mr. LaRouche in '76 whenhe ran for President the first time. I volunteered for him then. So, he decided to run again in 19 -- I think he actually announced in '79. Most of us who worked for him then were called back and said, "Look, you know, do you want to help out?" And of course, most of us did.

Q So, Felice called you up and said, "Linden LaRouche isrunning again for the Presidency. Would you, you know, coordinate things for us down in Baltimore?"

PENGAD CO., BAYONNE, N.J. 07002 - FORM 746

A I'll tell you the truth, I really don't -- I mean I can't exactly remember how I came. I just, you know, I'm a friend of his. I worked for him in '76. I don't remember. I suspect it was probably Felice because she's the person who I most often talked to, but it was really kind of natural that I would be a volunteer for him.

Q You're not given anything written saying that you're a LaRouche volunteer?

A No, no.

Q Do you know Robert Primack?

A Yes, I do.

Q How do you know Robert Primack?

A Well, he used to live in Baltimore, he doesn't any longer. He's a friend of mine. I've known him for a number of years.

Q Does he work with Citizens for LaRouche?

A He did some work for us down here. He's in New York now. I don't know if he still does work with Citizens for LaRouche.

Q Nancy Radcliffe?

A Yes, I know Nancy.

Q Does she work for Citizens for LaRouche?

A Yes, she does.

Q How do you know her other than through that?

A She's an old friend of mine. I know her from

PENCAD CO., BAYONNE, N.J. 07002 · FORM 740

several years.

Q Do you know if she's made contributions to Citizens for LaRouche?

A Sure, she has.

Q David Sanders?

A He's not a volunteer.

Q How do you know him?

A He's a supporter. He's not -- well, I shouldn't say he's not a volunteer. I mean, I think he's probably given out brochures at one time or another --

Q But he wouldn't be the same as you or your husband or Nancy Radcliffe?

A Right, he's -- right, he's really a different category.

Q And he's made contributions?

A Yes.

Q And you met him at fund-raisers or --

A I've met him -- he's a friend. I know him.

Q Kevin Salisbury?

A I know Kevin.

Q Is he a volunteer for Citizens for LaRouche?

A No, he's not, but his brother is LaRouche's campaign chairman.

Q And what's his name?

A Alan Salisbury.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q And Ann Taylor?

A I don't know Ann Taylor.

Q Do you know if she's made a contribution for Citizens for LaRouche?

A Well, I know her name was on the letter she sent me and after that I checked a print-out, you know, a print-out of contributors for Maryland, and her name is indeed on there.

Q But you've never met her?

A No, I haven't.

Q And you never received a contribution from her personally?

A No.

Q Ernest Pulsifer?

A I have met him.

Q Is he a volunteer?

A No, he's not.

Q Is he a contributor to Citizens for LaRouche?

A Yes. I presently receive a contribution from him.

Q Could you relate the circumstances?

A Yes. We met him on the street, I believe, a a leaflet thing. He was given me and I called him up and my husband and I arranged to meet him for a drink.

Actually, I remember the thing very specifically

PENCAD CO., BAYONNE, N.J. 07002 · FORM 740

because we were doing something else there that day. We met him at the Belvedere Hotel.

Q Could you recall approximately the date of this?

A I really couldn't. I mean -- I'll tell you what I do remember. It was before the December 9th fundraiser, --

Q Okay.

A -- because what we were doing is I was trying to sell him tickets to the fund-raiser actually and he gave his contribution that night.

Q And then you met him for a drink at the Belvedere Hotel?

A That's when we got the contribution from him.

Q At the Hotel?

A Yes.

Q And what was the amount of the contribution?

A I'm pretty sure it was $150.

Q Was that in cash?

A Yes.

Q Okay. Charles Clark?

A I know Charles.

Q Is he a volunteer for LaRouche?

A He's not a volunteer, but he's a very close supporter.

Q So he's made contributions?

A I am sure he has.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Have you ever received any contributions from him?

A I've been there while Charles has given contributions. He tends to give, you know, small contributions. He's a blue collar worker, I don't know if I've ever personally solicited contributions.

Q He usually gives you $10 cash here, $20 cash there?

A Something like that. Yes.

Q Okay, Felice Gelman?

A Oh, sure I know Felice.

Q She's Treasurer of Citizens for LaRouche?

A Yes.

Q Did you know her before she was Treasurer?

A Oh, yes.

Q Could you relate your relationship?

A College friends.

Q Mary Cavanaugh?

A Mary Cavanaugh, I do know, yes.

Q Is she a volunteer?

A No, she's not.

Q Is she a contributor?

A I believe so, yes.

Q Have you ever accepted any contributions from her?

A I think I have, yes.

Q Do you recall the amounts and when that was?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I know she bought a ticket to the December 9th fund-raiser. I remember that.

Q Did she give cash?

A I'm not sure.

Q Let me ask you a question. To the best of your knowledge, are all the money orders that have been purchased, purchased because the Citizens for LaRouche or the volunteers received cash first?

A No, not always. What happens sometimes is that when someone makes a contribution they don't want to do it on their checking account for any variety of reasons, ranging from they don't want their wife to know they're make a contribution or some people are just very nervous about contributing to political campaigns.

So, very often, especially when we get these in the mail, we very often get money orders.

Q So, the most part though, it would be cash because as you were describing, you were getting a lot of cash?

A Well, not most or less. I would say 50/50, whatever.

Q Steven Warm?

A I know Steve.

Q Is he a volunteer for LaRouche?

A He isn't any more. He used tobe.

Q Is he a contributor as far as you know?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A As far as I know.

Q Have you ever received a contribution from him?

A Yes.

Q Do you remember the circumstances, was it at a fund-raiser?

A He's given money at fund-raisers but he's also given money through some personal means.

Q And he would hand you some cash or something like that?

A He usually pays by check.

Q Do you know him from before citizens for LaRouche?

A Yes. He was my campaign treasurer.

Q In 1978?

A Right.

Q Belinda F. deGrazia?

A Yes, I know Belinda.

Q Is she a volunteer for that?

A Yes, she is.

Q And to your knowledge, has she made a contribution to --

A Yes, I'm sure she has.

Q Have you ever personally received money that she's contributed?

A I don't think so. I mean, I've seen her checks.

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

I've mailed her checks.

Q Robert A. Robinson?

A Robert Robinson is a volunteer, not here in Baltimore. He's in Washington.

Q He's District of Columbia?

A Yes, Washington D.C.

Q Is that one of the people that you or your husband would coordinate events when you do the Washington/Baltimore?

A No. He's not someone who tends to coordinate anything.

Q Do you happen to know where he lives?

A Do you mean precisely where?

Q Does he live in the District, or Virginia, or Maryland?

A Well, I'll tell you, he used to live in Baltimore and I know he used to live in the District and I think now he may live in Arlington.

Q How long ago did he live in Baltimore?

A Last year. He hasn't been in D.C. all that long. His folks live in Baltimore.

Q And Edward St. John?

A I have met him on occasion.

Q Would you consider him a volunteer for LaRouche?

A Oh, no.

Q Is he a contributor?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

A He's purchased tickets.

Q And has he given you the money for the tickets?

A I'm not sure whether I got the money from him personally or not.

Q Okay. Do you remember if he paid in cash or by check?

A I think both.

Q What makes you think both?

A I just seem to recall sending a check up. I just really don't remember. I mean, I remember purchasing a money order for him at one time, but I also think -- I think that we've sent checks up from him also.

Q Okay. Arthur Murphy?

A He's a volunteer.

Q In the Baltimore area?

A Yes, in Baltimore.

Q And would you know if he was a contributor also?

A I think so. Most of the people who are volunteers tend to also be contributors. It's hard to be a volunteer at a fund-raiser that you haven't bought a ticket for.

Q Constantine Philios?

A I don't think I know him.

Q You've never heard the name?

A I know the name Philios. I think I may know his wife, but I really can't say for sure.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q To the best of your knowledge he's not a volunteer for Citizens for LaRouche?

A Oh, no, he's not a volunteer as far as I know.

Q All right. To your knowledge, has he contributed to Citizens for LaRouche?

A I don't know.

Q Rustom Ghandi?

A I know him. He's a -- he's not a volunteer. He has a brother who's a volunteer.

Q Okay. To the best of your knowledge, could you give me a list of all those people you purchased money orders for?

A I couldn't possibly.

Q Okay, because I know as we've been going through you mentioned that you purchased for -- I think you just mentioned you purchased one for, was it Edward St. John?

A I know that a money order was purchased for him. I don't know whether I purchased it or someone purchased it, but I know that I processed a money-order for him.

Q Is there anyway you can recollect which contributors had money orders purchased for them?

A No, and as a matter of fact, on the contributors' print-out, I don't even think money-orders -- you know, we get these print-outs from New York and what it will say on there is the date of the contribution, contribution and

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

it will say whether it's a charge or a check, but I think money-orders are just listed by check, so I really don't, you know, I don't know. I mean we don't keep copies of anythng in that sense.

Q Besides Felice Gelman, who else would you communicate with in New York?

A Felice is really the only one on this campaign.

Q And how often would you say you're in touch with her?

A Oh, it depends on what we're up to. We're in touch pretty regularly.

Q Once a day, once a week?

A Less than once a day, but usually more than once a week.

I should mention also that Felice is a friend of mine so that -- I mean we don't always-- we talk a lot, not always about LaRouche's campaign, sometimes about her daughter, you know, I mean we just talked.

MR. BOGIN: Off the record.

(There was a discussion off the record.)

Q I'm just going to go over some of the things we probably already covered. You mentioned that Steven Warm is no longer a volunteer. Is there an explanation for that?

A I think his job just was, you know, too pressing.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

Q He still lives in Baltimore, did you say?

A Yes.

Q Do you happen to know where Nancy Radcliffe lives?

A Yes, I do.

Q Could you give me the address?

A It is on 31st Street between -- I think between Calvert and Guilford.

Q Does she live in an apartment building?

A It's a rowhouse.

Q You don't happen to know the number, do you?

A No, I don't.

Q Do you know where Kevin Salisbury lives?

A I don't. I know he lives in west, the western part of the city, but I don't actually know where.

Q You said he wasn't a volunteer?

A No. He's not.

Q His brother's related to the campaign, but --

MR. PARKER: No, his brother is.

Q Right, his brother's related to the campaign but--

A Kevin's not.

Q -- Kevin's not. Do you see him once a week, would you say?

A No, I don't see him once a week.

Q Do you know where David Sanders lives?

A He lives back of 25th Street on the other side of

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

Greenmount Avenue but I don't know his address. I've never been to his house.

Q Okay, but it's in Baltimore?

A Yes, it's in Baltimore.

Q And as far as you know he's still living in Baltimore?

A Yes.

Q Okay. Do you happen to know where Harold Harrison lives?

A Well, I just, you know, would open his letter and that has 3900 North Charles.

Q But besides seeing it in a letter, would you have known any other way?

A No.

Q All right. You filled out the contributor part for him --

A Yes.

Q -- that you sent with the cashier's check.

A Right.

Q And I assume a document that looks like this?

A Yes.

Q When I say this, for the record, I mean --

A Well, I should say something. This, the thing like this that is from Harold, I don't think that was sent with the check but I honestly don't know. I think it was

PENNSAD CO. BAYONNE, N.J. 07002 - FORM 740

gotten after the check. I'm not positive.

Q Okay.

A But that was a separate thing.

Q Let's discuss, let's go over a typical scenario.

MR. PONDER: You have to identify that for the record.

Q Okay. For the purposes of identifying one of the documents for the record that we're talking about, it's a sheet of paper with an amount of a contribution and the date and it's signed by the contributor with his address.

We have already discussed that you purchased a cashier's check for Harold Harrison.

A Right.

Q And you took that back to your house?

A I don't know where I took it.

Q And you filled out a contributor form?

A I filled out a little receipt which I described to you.

Q It has the name of the contributor?

A Name, address, don't know whether it has phone number, and since his was two-fifty, which makes it over a hundred, I probably asked him to fill in his occupation.

Q And then you took the check and that contributor information and stapled it together?

A Yes.

PENNAD CO., BAYONNE, N.J. 07002 FORM 740

Q And mailed it to New York?

A Right.

Q Along with any other checks you might have had at the time?

A Probably.

Q That contributor information, could you give me how you knew to fill that out?

A I was probably provided with it through some form.

Q All right. When you first became a volunteer, Felice Gelman was probably in touch with you. Did she give you instructions on how to fill out these forms and why they were necessary?

A She told us in the very beginning -- I mean her instructions were that we couldn't turn in contributions of over $100 unless they were, you know, in cash, unless they were identified as belonging to somebody. In other words people couldn't just, if you were passing a hat around, -- and we do this at fund-raisers -- we tell people if they're going to put cash in they can't do it for more than $100. If they want to dothat they have to fill out a pledge card. So, we got that procedure done.

We were told that if we get money orders for people we have to have signed statements. We know that contributions up to $250 are matched but that you can take a

PENNSIP CO., BAYONNE, N.J. 07002 - FORM 740

contribution of up to $1,000.

Q When you say matched, what do you mean by that?

A Matched by you generous people at the Federal Election Commission.

Q With federal monies as well?

A As far as I know.

Q Matched up to the first $250 of a contribution?

A As far as I know, yes.

Let's see, what else can I tell you.

Q Tell me more about the form. You were sent them, sent the forms?

A Yes. We received that address from New York.

Q And for their written instructions or did you talk to Felice on the phone?

A Both, both.

Q And she gave you the instructions both written and orally about what you had to do with this information?

A Yes, sir.

Q Was that the only training that you had, or instructions, basically, fromthe phone and from the mouth?

A I mean we never had a class on it or anything like that.

Q There's no work shop or anything --

A No.

Q -- all volunteers across the country?

PENNAP CO., BAYONNE, N.J. 07002 - FORM 740

A No.

Q When you do the collection, at some occasions you mentioned that you collect through passing the hat?

A Right.

Q And you collect the money?

A Right.

Q And you instruct people not to put in more than $100.

A (Witness indicates yes.)

Q What do you do then? Do you just purchase a money order with that?

A Yes. What we'll do is we take the whole sum of money, purchase a money order for it. We identify it as coming from a particular fund-raiser. We have to put down the place of the fund-raiser, place, time -- and I don't know whether it's for your, you know, for your purposes or not but we also try to fill in how many people attended, how much money total was raised, how much in passing the hat, how much in checks, stuff like that.

Q Do you remember what a possible sum in any of these fund raisers were from passing the hat, what the sum total in the hat was?

A I really don't know.

Q Was it $500 or $1,000? What was the largest amount that you remember?

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

A I really couldn't give you a figure.

Q Have you ever taken money from the hat and purchased a money-order with it?

A No, I don't usually do that.

Q The person who does it, they purchase the money order and then the money order is sent to New York?

A As far as I know, yes.

Q Do you know what information is supplied on that money order?

A I've never done it myself. I'm pretty sure that was supplied on there.

MR.PARKER: Well, don't guess.

A Yeah. I really don't. I think it's just the event, the event itself.

Q You mentioned before that a person can only contribute up to a thousand dollars.

A Right.

Q Do you know why that's so?

A I think it's just -- rule. I mean, I don't know why.

Q Are you aware that there's a limit of $1,000 per contributor for LaRouche?

A Yeah, that's what I meant.

Q How do you keep track of small contributions?

A I actually don't. I depend -- I really depend

PENNAC CO BAYONNE, N.J. 07002 FORM 740

entirely on New York to do that. I know on one occasion that I can recall, we sent a contribution up, for instance, which was over the limit; but when that happens -- see, we don't -- I mean because we don't have an office and don't really have any kind of major operation, we really just do very routine kind of activities and we really leave the -- side on New York to keep records and figure stuff out.

Q But New York only has whatever records you have sent up previous.

A They have what we mailed them.

Q Right.

A And I'm sure, you know, they get contributions on their own.

Q Well, when you pass the hat around somebody might contribute $50. Would New York know that there was an individual there who contributed $50, the name of that individual?

A I don't know. I mean it depends if the individuals identify themselves.

Q But you don't require that he identify himself when you pass the hat around?

A If a hat is passed, people usually just throw in in individual contributions.

Q Is it possible that this same individual might be at various city functions and more than one function --

PINKAD CO., BAYONNE, N.J. 07002 · FORM 740

A Sure.

Q -- where the hat is passed? Is it possible that each time he puts out $50?

A I suppose anything is possible.

Q Well, if that were possible and let's say he was there --

MR. PARKER: Well, she doesn't know.

Q We're talking about possibilities. If that happened, wouldn't then the person have contributed a couple hundred dollars by this time?

A I suppose that's all possible. I mean we take whatever safeguards we can and depend on people's honesty.

Q But you would really have no way ofknowing how much that person might aggregate in terms of contributions?

A Well, let me explain something to you. At a fund-raiser, the way this thing works is, we don't -- passing a hat around is, that is a bottom line. Usually there is bidding, you know, "Would anyone here like to contribute $1,000?"

"Would anyone like to contribute $500?" And that's when people raise their hand and either checks are collected from them or they fill out pledge cards and promise to give the money on a certain date.

We usually work our way down to $25. Below $25 -- we're not going to start taking $10 bids so below

PENCAD CO., BAYONNE, N.J. 07002 · FORM 740

$25 we tend to -- you know, I'll pass the hat around and try to get, you know, for people who are not in a position to give lots of money and want to thrown in five or ten bucks.

So, it's very unlikely because we, you know -- you know what fund-raisers are like. You put a lot of pressure on people to give money, so somebody is going to give $50 they usually want us to know that so that we stop bothering them all night and say, "How about more money?" You know. It just stands to reason.

Q I understand the reasons but basically you don't really keep track of the smaller contributions?

A I don't keep track of anything.

MR. PARKER: Well, she doesn't do it because she never was involved.

THE WITNESS: It's really not my function. I mean I just --

Q Who is head of the fund-raisers then in this area?

A There isn't any head of the fund-raisers.

Q Well, who's responsible for keeping track of these things?

A New York's responsible.

Q Does New York come down to the fund-raisers?

A Very often they do. I mean they usually send speakers down also.

PERSHAD CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: As a matter of fact, what we're suggesting is that you take your inquiry to New York and leave these poor people in Baltimore alone.

Q You've been to these fund-raisers where they pass the hat.

A Yes.

Q Have you personally passed the hat?

A No.

Q Do you know anybody, have you seen anybody pass the hat? When you say pass the hat, does somebody go around and --

A No, usually what happens is you give it to the first person in an aisle and people will just pass it from hand to hand.

Q And then do you know who usually ends up with the hat at the end of this fund-raiser?

A No, I don't.

Q Have you ever ended up with the hat at the end of this fund-raiser?

A No.

Q Then the money in the hat is used to purchase a money order?

A As far as I know.

Q And then it's sent to New York?

A As far as I know.

PENNAD CO., BAYONNE, N.J. 07002 · FORM 740

Q So when you collect contributions or receive contributions from various sources, is it usual that you personally will send it up to New York by mail?

A Very often.

Q Do you ever wire money up to New York?

A No.

Q Do you enclose a list of contributors up to New York with checks? Do you have a separate list saying, "Enclosed in this envelope are contributions from the following people?"

A No.

Q Or any totals?

A No.

Q Is there any cover letter?

A No. I just usually shove the stuff in an envelope. I mean, I let them know by phone that it's coming but I don't -- I don't really tell them what's in there.

Q Are you aware that each contributor has to sign their names that they've made a contribution in some form?

A I'm aware that they have to do it to a certain point. I mean, as I understood it, people are able to make small contributions without signing their name.

Q At what point do you need to have their signature?

A We try to get it when they actually make the contribution.

Q When you purchase a money order with money that

PENNAD CO., BAYONNE, N.J. 07002 · FORM 740

is supplied, do you have the contributors sign the money-order?

A Sometimes we do but we never purchase a money order unless a contributor has consented to its being purchased. I mean we don't just routinely go out and do it. I mean, at some point, somebody lets the person know that we can't, you know, that the only way we can get it to our New York office is by purchasing a money order and it's, you know, at that point.

Very often if we purchase a money order for someone they don't sign the money order and as I understand it from my own instructions that's okay, as long as they sign something else which notes that they contribute the money on a certain date.

Q And then you send everything up to New York?

A I send it up as soon as it's in any kind of sendable form.

Q Do you maintain a list in Baltimore of contributions and contributors?

A We have a computer printout.

Q Sent from New York?

A Right.

Q You don't generate your own list in addition to any computer print-out?

A No, we really don't.

PERSAB CO., BAYONNE, N.J. 07002 · FORM 740

Q All right. Does your husband sometimes send the mailing out of those checks that have been received of those contributions?

A He usually doesn't get involved in the mailing but it's usually done.

Q That's usually what you do?

A Not always. Any number of different people.

Q Do you know who else might send?

A Any one of the volunteers might do it. And you should know that I don't, you know, I don't have a particularly unique function in this whole thing so --

Q What amount is too small to require the documentation of contributor information?

A Well, what we try to do is -- I mean any amount that we get, you know, we try to get documentation for it because as I understand it, as long as we have documentation the money is matchable. So, we -- you know, we try to get it for anything.

Q Is there a figure that you need it, you must have it?

A I don't know.

Q That printout that you get from New York, is it sent to you?

A It's usually sent to our house. Sometimes, you know, if we are visiting in New York we pick it up.

PENNAC CO., BAYONNE, N.J. 07002 - FORM 740

Sometimes it's sent to other people.

Q All right. How often would you say in the past year you went up to New York?

A Well, my folks live up there so I go up all the time.

Q Once a month?

A Sometimes.

Q Okay. I have some documents which I am going to ask you to identify.

A Okay.

Q And I'll mark it as exhibits after you identify them. I have here a Xerox copy of two personal checks of yours, one entitled Dr. Debra J. Hanania at 4004 Linkwood Road, for $50 and one that has your name, Debra J. Hanania, and your husband's name, Lawrence K. Freeman, for $40. I just want you to look and see if you can identify --

MR. PARKER: Do you have more than one copy of these things or not?

MR. BOGIN: No, but they will be attached to the deposition.

A They're my checks.

Q Your signature, your checks?

A Yes.

MR. BOGIN: Okay. I can write these checks to be marked the next number -- I guess it's Commission

Exhibit No. 12 -- which are two personal checks, one for $50 and one for $40, of Debra J. Hanania. She's identified them as her own.

(Whereupon, Commission Exhibit 12 was marked for identification.)

Q I have another personal check from Debra Hanania for $15. Can you identify that check as yours?

A Yes, sur, that's mine.

MR. BOGIN: Okay. I'd like to mark that personal check for $50 as Commission Exhibit No. 13.

(Whereupon, Commission Exhibit 13 was marked for identification.)

Q I have here a Traveler's Express Money Order payable to Citizens for LaRouche with the drawer being Kevin Salisbury. The money order number is 2957627. I ask you to look at that, then whether or not you have ever seen that money order.

A You know, I don't know. I looked at this before. I have copies of this and it doesn't look like my handwriting, but it could have been. We have a signed letter that's attached to this thing which has Kevin's signature on it. I don't believe this is Kevin's signature.

Q Okay. So how do you know that that might not be Kevin's signature?

A Well, I know, because when you people sent me a

PLINER CO., BAYONNE, N.J. 07002 - FORM 740

letter, I called New York and I asked New York -- I knew exactly, you know, what your problem was. I asked New York for copies of the signed letters.

Now, I asked for a signed letter from Kevin, so I know that the signature on that letter is in fact his.

I may have purchased this for Kevin or not. It doesn't really look like my handwriting but I don't know. It could be.

Q So you can't identify that as your handwriting?

A No, I can't positively, no.

Q It's possible that it's your handwriting?

A Well, I mean, I suggest you know, you know very clearly, I mean, I'm not denying that I purchased money orders and you know, billed in an individual's name. I don't know if I did on this particular one. I don't think so. I can't really identify it as my handwriting.

Q Okay. I'd like to --

MR. PARKER: But what you do know is that Salisbury did in fact contribute $150, --

THE WITNESS: I absolutely know that.

MR. PARKER: -- and signed a letter.

THE WITNESS: I know that we have a signed letter. I mean I asked him to sign a letter. He actually did it in front of me.

MR. BOGIN: Okay. I would like to mark this

letter, I called New York and I asked New York -- I knew exactly, you know, what your problem was. I asked New York for copies of the signed letters.

Now, I asked for a signed letter from Kevin, so I know that the signature on that letter is in fact his.

I may have purchased this for Kevin or not. It doesn't really look like my handwriting but I don't know. It could be.

Q So you can't identify that as your handwriting?

A No, I can't positively, no.

Q It's possible that it's your handwriting?

A Well, I mean, I suggest you know, you know very clearly, I mean, I'm not denying that I purchased money orders and you know, billed in an individual's name. I don't know if I did on this particular one. I don't think so. I can't really identify it as my handwriting.

Q Okay. I'd like to --

MR. PARKER: But what you do know is that Salisbury did in fact contribute $150, --

THE WITNESS: I absolutely know that.

MR. PARKER: -- and signed a letter.

THE WITNESS: I know that we have a signed letter. I mean I asked him to sign a letter. He actually did it in front of me.

MR. BOGIN: Okay. I would like to mark this

CommissionExhibit No. 14. That's that Traveler's Express Money Order signed by Kevin Salisbury.

(Whereupon, Commission Exhibit 14 was marked for identification.)

Q I have a Federal Express Money Order No. 113833058, payable to Citizens for LaRouche from David Sanders and I ask you if you can identify that money order?

A Yes.

Q How do you identify it? Is that your handwriting?

A Yes, it is.

Q You purchased the money order?

A Yes.

Q And that's your handwriting?

A Yes, and there is a signed letter from David which was attached to it.

Q But the signature that is on that money order is yours?

A Yes.

MR. BOGIN: Federal Express Money Order by David Sanders should be marked Commission Exhibit No.15.

(Whereupon, Commission Exhibit 15 was marked for identification.)

Q Now, you mentioned that you had Mr. Sanders sign the letter in front of you.

REGAL CO. BAYONNE, N.J. 07002 - FORM 740

A Yes.

Q Do you recall basically what it said?

A I think I have a copy of it here. It's -- what it says on it, it says exactly what this thing says,"I contributed --" Let's see, which --

Q Take your time. Maybe you can find it.

A Let me just ask you, which was the amount because he's given a number of contributions. $45?

MR. PARKER: $45?

THE WITNESS: Yes.

Yes, it says, "I contributed $45 to Citizens for LaRouche on 11-25-79," and then it's signed David -- I guess C. Sanders. 615 St. Ann's Avenue, Baltimore, Maryland, 21218. And it says, "If contribution is over $100, fill in." and since he has accumulatively given over $100 it says, "Lab technician, State of Maryland, State Office Building on Preston Street, Baltimore, Maryland 21210".

Q What's the date of that letter?

MR. PARKER: 2-23-80.

Q 2-23-80?

A Um-hum.

Q Okay. This Federal Express money order 113833050 is dated November 25th and November 28th.

MR. PARKER: That's what she just read, "I contributed $45 to Citizens for LaRouche on November 25,

PINKAS CO., BAYONNE, N.J. 07002 - FORM 740

1979." That's what the letter says.

Q Okay, and what's the date of that letter?

A The date up in the corner.

MR. PARKER: February 23, 1980.

Q February 23, 1980. Okay. I have here a letter from David Sanders dated December 28, 1979. It says, "Dear Citizens for LaRouche: This is to certify that I personally contributed $45 in the form of money order payable to Citizens for LaRouche on November 28, 1979. Sincerely, David Sanders." Do you recognize that letter?

A I absolutely do. This is not a letter that was submitted to New York as far as I know. This was a letter which was typed by me as a sample to our volunteers in terms of what they had, the information they had to have. I used David as a sample because I had his check in front of me. But this is not -- this isn't David's signature and this is not meant to be a letter. And if it was submitted to you by anybody, it was submitted in error.

Q Sir, as far as you know you didn't send that up to New York?

A I don't think I did, no. As a matter of fact I am sure I didn't. This was hanging on a bulletin board in my office for about six months.

Q But it is a copy of --

A It is indeed a letter and it says all the things

you said.

Q And it's signed by you?

A Yeah.

Q You signed David Sander's name on that letter?

A Sure. It's a sample.

MR.PARKER: But you didn't furnish any such document to the Federal Election Commission?

THE WITNESS: No, absolutely not.

Q And you didn't send it up to New York?

A No, I didn't send it to New York.

Q But it's possible that it was sent to New York?

A Anything's possible. If it was sent to New York, it was a stupid mistake.

MR. BOGIN: Okay. I would like to mark this letter dated December 28th, 1979, with the signature of David Sanders on it as Commission Exhibit No. 16.

(Commission Exhibit No. 16 was marked for identification.)

Q Okay. You said that that document, that letter of December 28th, 1979, was hanging on your bulletin board for six months. When you say six months, until very recently?

A To tell you the truth, it may still be hanging on my bulletin board.

Q And the bulletin board is where?

BENDAD CO., BAYONNE, N.J. 07002 - FORM 740

A I have a little office area in my house. It's not really an office. It's a den. You know, I have a bulletin board over there and I stick things on it.

Q So you have the original?

A I don't know whether mine is an original or a Xerox. See, what I did, was I Xerox'd a number of copies of this and I gave it to the people and I said, "Look, you know, you have to get signed copies."

This was -- see, we have -- this exact form, by the way, is the exact form that we got from New York.

Q When you say this exact form, it's --

A This is your -- I don't know what this is.

Q This is Commission Exhibit No. 4.

A All right. This exhibit here is the precise form of the letter we were sent from New York, but before we actually received these -- and at one point we had run out of them -- I didn't have a blank form to give people so I wanted to make sure people knew what kind of information to put out. So we do something like this, which is your Exhibit No. 16; and I must have Xerox'd -- I don't know, there are 25 volunteers -- I probably Xerox'd 25 copies of it.

I don't know whether the one I have is the original or the Xerox, but you know, they are tacked up in my -- in my house.

Q So for the David Sanders' contribution of $45, did you purchase a money order for him for $45?

A Yeah, I think I did.

Q And then sometime subsequent to that you had him sign a letter --

A Yes.

Q -- saying he made a contribution? When did he giveyou the $45?

A On a date that is on his letter. I can remember. Sometime in November, I think.

Q Okay. So, did he give you the money before you purchased the money order or did he give you the money after you purchased the money order?

A He gave me the money before I purchased the money order. It would be hard to purchase a money order with no money.

Q But you could use your own money.

A But I wouldn't do that.

MR. PARKER: In fact you never did that, did you?

THE WITNESS: No, I never would do such a thing.

Q On the letter that David Sanders signed, it was dated February '80, sometime in February '80 --

A Something like that, yes.

Q -- when was the money order sent to New York?

A Back in November.

PENN-AM CO. BAYONNE, N.J. 07002 - FORM 740

Q And then subsequent you sent the letter confirming the contribution with his signature on it?

A Yeah.

Q How did it come about that it was four months in between?

A Well, you see, when we do these things I try to get the letters up right away within a matter of a day or two.

Now, what happens is that sometimes I don't know whether the problem is that we don't send them the letters or whether they lose the letters. What will happen very often is we will get a call, usually around the time, I guess, that we make a submission to the FEC when they actually go over their books.

We've got to call them and say, "We don't have things on file from, you know, Joe Smith, this person, that person and that person."

Q You'll get the call from FEC?

A No, no, I'll get a call from Felice and she'll say, "I don't have this stuff." You know, sometimes if I know the person I'll volunteer to get the letter. "Oh, that's all right. We can get a letter from them."

Sometimes I don't know who the person is and I'll say, "Well, you should getthe letter," and I think what they do is they mail the person a form asking them to confirm the

PENNSAD CO., BAYONNE, N.J. 07002 - FORM 740

contribution but by and large what we try and do is actually get the whole thing done at once because it just saves a lot of bother and a lot of phone calls back and forth.

Q To make sure there's no ambiguity, Commission Exhibit No. 16 is your handwriting --

A Yes.

Q -- of David Sanders' signature.

A Yes.

MR. BOGIN: Off the record.

(There was a short recess taken in the deposition.)

- - - - - - - - - -

Q Familiarize yourself with Commission Document Nos. 15 and 16. The Federal Election Commission receives this money order from David Sanders with this supporting letter, meaning Exhibit 16, for matching purposes.

What explanation can you give that the commission would get these two documents though David Sanders is both times signed by yourself?

A Well --

MR. PARKER: She's already explained it in great detail.

THE WITNESS: Yeah, I have explained it and, you know, I have never, beyond my own campaign, submitted anything to the FEC so I can't explain what has or hasn't

PLIMPTON CO., BAYONNE, N.J. 07002 - FORM 740

been submitted to you.

Q It surprises you that this letter should show up at the Federal Election Commission?

A Yes, it does, greatly surprises me.

Q You say that the December 20th, 1979 letter is a sample letter?

A Yes.

Q How many samples did you make of the letter?

A I Xerox'd it. I could have Xerox'd anywhere from 20 to 25. I furnished volunteers with copies of it.

Q And the volunteer comes in and you say, "This is the information you should get?"

A Right.

Q "And it should look this way"?

A Right.

Q "And be signed by the contributer?"

A Right.

Q And what other instructions do you give the volunteers concerning that type of signature letter?

A The only other instructions I give them is that if it's an amount over $100 that they should please try to get information on where the person works, and that's usually all I give them.

Q What other kinds of form does Citizens for LaRouche use when they want a contributor's signature letter?

PLYMAR CO., BAYONNE, N.J. 07002 · FORM 740

A Well, there's this particular kind that we've been discussing. There's another form that we have when an individual writes a check and I'm trying -- I'll tell you the truth. I don't remember the exact wording but we do have a form because very often one person will give a contribution in his name. It's a contribution that comes from himself and his spouse. So then we have a letter that says, "I made this amount of money contribution on such and such a date and it should be understood that this contribution is given, you know, from myself and my wife." Then we ask both people to sign it.

And then there's another letter that has to do with when someone signs a check which might appear to be a business account but it's not. As I understand it, as long as it's not incorporate funds -- in other words, as long as the person is not incorporated and is the sole owner of his business, then he has to -- he can write that kind of check but what he has to make clear is that it was drawn from his personal funds or something like that. I don't remember the exact wording but there are a number of these different letters.

Q Could I see a copy of theletter, the February letter that's signed by David Sanders? Where did you get a copy of this letter from?

A From David.

Q From David Sanders but how do you have a copy in

his file now?

A Linden mailed it to New York and then I called New York and I said, "Look, you know, I want copies of all this stuff." They asked me why. I said, "I got a letter from the FEC indicating, you know, that there were problems with these people's contributions and I just want copies of all this stuff." And Felice actually -- they weren't mailed. Felice brought them down.

(There was a discussion held off the record.)

Q Do you recall any other contribution submitted that you received and sent up a letter similar to this one?

A What do you mean?

Q When I say this one, I mean Commission Exhibit No. 16. What other contributor, do you recall, signed a letter similar to this that you sent up has accompanying documentation to a money order that has a purported signature of a contributor?

A I'm not sure I understand what you're -- when you say similar to this, you mean this kind of information?

Q This form.

A That exact form?

Q That's in Commission Exhibit 16 where it goes -- this is the sample that you handed out to volunteers though --

A Yes.

PENNCO CO., BAYONNE, N.J. 07002 - FORM 740

Q -- I assume that you would get the exact form with the exact information.

A I wouldn't assume that. That just shows that the information they need. We were waiting for copies of the actual form which New York sent us. I don't know -- I mean I don't know. That's all I can say.

MR. PARKER: Here's the actual form.

THE WITNESS: Where?

MR. PARKER: Right there, what you got in your hand.

Q I show you a document dated 2-23-80 signed with the name David Sanders, 613 St. Ann's Avenue, Baltimore, Maryland, which says he contributed $45 to Citizens for LaRouche on November 25th, 1979, and gives his occupation, place of employment, address, since his contribution is over-- well, it says, if contribution is over $100 he should supply the information and which he did.

Can you identify that document?

A Yes. David Sanders signed this letter in my precense.

Q This is the form that New York sent out to you?

A I think so, yeah. It's -- either this is precisely the form or after the actually sent me a form I might have at some point retyped it but this is the -- this is the general form of all the letters.

PIGEON CO., BAYONNE, N.J. 07002 - FORM 740

Q Now, I have a question. This sample document that you had, December 28, 1979, how come you weren't able to get the supporting documentation at the time of your sample, December 28, 1979?

A I actually thought we did have it, to tell you the truth.

Q And then when did you find out that you didn't have it?

A I, at some point --

MR. PARKER: She's answered that question already.

A You know, you get these calls. We get calls and say, "Look, we don't have a file on so and so for a contribution he made on such and such a date. Can you get theletter? Do you want us to do it?"

This particular instance I know David, I've seen him often, so I said, "I can get the letter from David. Don't bother."

Q Do you recall when you were notified by the Commission of reason to believe that you might have violated the election laws?

A I don't recall but probably have a copy in here.

MR. PARKER: February 19th.

THE WITNESS: February 19th.

Q Do you find any coincidence that this confirmation letter is signed February 23rd?

A No, I don't find any coincidence.

MR. BOGIN: I'd like to enter Commission Exhibit No. 17 into the record as the contributor information from David Sanders saying he contributed $45 to campaign dated February 28th, 1980. It's Commission Exhibit Document No. 17.

(Whereupon, Commission Exhibit 17 was marked for identification.)

Q I have a check payable to David Sanders from Household Finance for $1009.58. I ask you if you have ever seen this check before, a copy of it?

A I am not sure.

MR. PARKER: Let me see that.

THE WITNESS: I'm sorry. I couldn't say if I've seen it before.

MR. BOGIN: I'd like to enter Household Finance check to David Sanders as Commission Exhibit No. 18.

(Whereupon, Commission Exhibit 18 was marked for identification.

Q On the other side of that check is an endorsement which is pay to the order of Citizens for LaRouche signed by Sanders. Do you recognize or remember the endorsement?

A No. I mean, you know, I don't know.

MR. BOGIN: The reverse side of that Household Finance check is being entered into record as Commission

PINCAR CO., BAYONNE, N.J. 07002 - FORM 740

Exhibit No. 19.

(Whereupon, Commission Exhibit No. 19 was marked for identification.)

MR. PONDER: Let's go off the record a minute.

(There was a discussion held off the record.)

Q I have here a document signed or ostensibly signed by David Sanders and Lenore Sanders saying that they contributed $1009.58 to Citizens for LaRouche. The date's illegible but it looks like January 22, 1980. Do you recognize that document?

A I'll tell you. The only thing I recognize about the document -- which means I probably mailed it, although I didn't get David to sign it -- is this stuff down here, this print.

Q Below the signature lines and the address --

A Correct.

Q -- there is printing saying,"Lenore Sanders, Spouse," and spouse is in parenthesis, "and David Sanders"?

A Correct.

Q And then address?

A 613 St. Ann's Avenue, Baltimore, Maryland. These things right here --

Q That's your handwriting?

A Yeah, that's printed just because I was concerned

before I mailed this back, you know, it would be difficult to read.

Q So then you're saying that you mist likely mailed that slip of paper?

A I don't know if I actually mailed it. I know that it probably crossed my hand at one point because I very starkly can recognize my own handwriting.

Q Do you remember if this document was with the previous check that I showed you from Household Finance for $1,000 --

A I don't know but I see it's for the same amount.

Q Would you recognize David Sanders' signature if you saw it?

A Well, I think that's his signature but that's only because I saw the other letter which I think is his signature.

Q But other than that you had no --

A I can barely recognize my husband's signature.

MR. BOGIN: I'd like to put into the record Commission Exhibit No. 20 which is a signature of Lenore and David Sanders saying that they contributed $1,009.58 to Citizens for LaRouche.

(Whereupon, Commission Exhibit No. 20 was marked for identification.)

PENDAR CO., BAYONNE, N.J. 07002 - FORM 240

Q I have an American Express money order 55-467316467 made out to Citizens for LaRouche in the sum of $25 with the name and signature of David Sanders. I ask if you can identify that American Express money order.

A No, I can't.

Q Do you see where David Sanders has signed his name?

A I see David Sanders printed. I see David Sanders again.

Q Does that look like your handwriting, that David Sanders?

A Definitely not.

Q All right. I ask you to look at Commission Exhibit No. 20 and ask you if you see any similarity between David Sanders' signature in Exhibit 20 and in the money order that I'm showing you now?

A I'm not a handwriting expert but they don't look the same, no.

Q But you didn't sign that David Sanders there?

A I didn't sign either of these.

Q And you don't identify or recognize --

A No.

Q -- this American Express money order?

A No.

Q It hasn't come across your desk? You didn't

PEGASUS CO., BAYONNE, N.J. 07002 - FORM 740

send it to New York?

A Not that I remember. I mean it might have come across my desk, I don't know.

Q Is it possible that you filled out the payee part, Citizens for LaRouche?

A I don't think so. It just doesn't look like my handwriting at all.

MR. BOGIN: I'd like to enter into the record Commission Exhibit No. 21 which is American Express money order for $25 by David Sanders?

(Whereupon, Commission Exhibit 21 was marked for identification)

Q Do you remember purchasing --

A No, that wasn't purchased --

Q -- that money order which is Commission Exhibit No. 21?

A That wasn't purchased by me.

Q I have in front of me American Express money order 55-4669384 4, which is payable to Citizens for LaRouche and ostensibly from Ernest K. Pulsifer: and I ask you if you recognize the money order?

A Well, I assume that this is the money order for the $150 I got from Pulsifer. I don't remember if I purchased this money order or not.

Q Do you recognize the handwriting?

PEARL CO. BAYONNE, N.J. 07002 - FORM 240

A I don't know. You know, I don't know. It could be my handwriting. I don't know -- I can't positively identify it as my handwriting, but I did get some money.

Q Mr. Pulsifer gave you $150?

A Yes.

Q You went out and purchased a money order?

A I don't know whether I purchased it or not. I can't remember whether I purchased it or whether I asked someone in the office to because when he gave us money it was at night so I knew the money order wasn't purchased that night.

Q If either you or somebody, one of the volunteers, purchased the money order, would either you or one of the volunteers that filled out the information on the --

A Yeah, sure.

Q -- money order?

A Yeah.

Q That wouldn't be Mr. Pulsifer's writing then?

A I don't think it is because I have a letter from Pulsifer and I don't think that's his handwriting.

Q Could you show me the letter from Mr. Pulsifer?

A I don't know. Do you have --

MR. PARKER: I'll have to check. It would be one of these letters that says, "I contributed --"

THE WITNESS: Yes. I don't know if they sent

PENNSAUKEN CO., BAYONNE, N.J. 07002 - FORM 740

us down a copy of it. I know one exists.

MR. PARKER: No.

THE WITNESS: We don't have it. If you need it, I could get them to send you one from New York.

MR. BOGIN: That would be very helpful. I'd like to put American Express money order --

MR. PARKER: Oh, here it is. I got it right here.

MR. BOGIN: May we have a copy to put into the record?

MR. PARKER: Sure.

MR. BOGIN: I have American Express money order No. 55-466938424 to be Commission Exhibit No. 22.

(Whereupon, Commission Exhibit No. 22 was marked for identification.)

Q On Commission Exhibit No. 22, well, how do you think Pulsifer is spelled in that money order?

A This looks like P-u-l-s-i-f-o-r.

(There was a discussion held off the record.)

Q This document in front of you, it's dated 4-3-80. It's typed saying: "I contributed $150 to Citizens for LaRouche on December 1st, '79. This contribution was from my own personal funds and not drawn on an incorporated account." And there seems to be a signature of Ernest Pulsifer with the address. Do you recognize this document?

PENNAD CO., BAYONNE, N.J. 07002 - FORM 740

A I personally don't recognize it.

Q Did you --

A I know we asked Ernest Pulsifer to sign a letter.

Q And you asked him to do it on April 3rd, 1980?

A That's what it says. I think he was probably asked before then..

Q Did you personally go out and have him sign this?

A No.

Q Did your husband?

A I don't know. He might have. He knows Pulsifer.

MR. BOGIN: I'd like to enter this as Commission Exhibit No. 23.

(Whereupon, Commission Exhibit No. 23 was marked for identification.)

Q You've never seen Commission Exhibit No. 23 until when?

A Oh, I don't -- I can't tell you that I've never seen it. I don't know. I mean, I've seen a lot of those letters. I don't know if I've ever seen that letter or not.

Q This was sent down from New York upon your request.

A Yes, sir; yes.

Q When did you receive it?

A I don't know when. I guess right around the time

I gave you all that stuff. I really don't remember.

Q On Exhibit No. 23 it says that the contribution was made on the 1st of December and the money order says that it was the 4th. Can you explain that?

A It's possible that the money order wasn't purchased until a couple of days afterwards.

Q That he gave you the money first and then it was a couple of days afterwards --

A As a matter of fact, I bet if you look on the calendar -- December 1st, I thought it was a weekend -- December 1st of '79 was a Saturday.

MR. PARKER: Well, the thing says on or about 12-1-79, anyway.

THE WITNESS: It's possible he gave me the money on a Saturday and, you know -- I don't know.

MR. PARKER: The letter says on or about 12-1-79.

Q Do you know who might have the original of this document?

A I'm sure New York would have it.

Q I have in front of me Citizens for LaRouche contributor information and another American Express money order, 5546693811, to Citizens for LaRouche from Ann Taylor. I ask if you recognize these two documents on that sheet?

A No, I don't. I recognize this. It's got my initials on it.

PLIMSOL CO., BAYONNE, N.J. 07002 - FORM 740

Q Does that mean that you filled out that top part?

A Probably, yes.

Q And did you purchase a money order from Ms. Taylor?

A I don't think so.

Q Is that your handwriting on the money order?

A I don't think it is. I slant that way. I don't think that is my handwriting.

Q Do you happen to have a letter in your files that says that she made this contribution?

MR. PARKER: We don't have anything relative to Ann Taylor to the best of my knowledge.

A I don't actually know her -- most of these other I actually have met at least on one occasion.

Q Right, but it says CFL rep. and that's DHF, that stands for -- that's your initials.

A All that that means is that I'm the guy who filled out this slip.

Q And where did you get the information for this slip?

A I don't remember. It might have just gotten scribbled on this envelope, whatever. I don't know.

Q You don't remember filling out the American Express money order?

A No, I don't recall filling out that one.

Q Or purchasing it?

PENNSAD CO., BAYONNE, N.J. 07002 - FORM 740

A No.

MR. BOGIN: Okay. I'd like to enter the Citizens for LaRouche information in the American Express money order by Ann Taylor into the record as Commission Exhibit No. 24.

(Whereupon, Commission Exhibit 24 was marked for identification.)

Q I have an American Express money order, 55-466938402 to Citizens for LaRouche from Charles Clark. I ask if you recognize that document.

A Yes, I do.

Q Did you purchase the money order?

A Yes.

Q Is that your handwriting?

A Probably.

Q Did you write Charles Clark, sign it as Charles Clark?

A Probably.

Q Did you ever get another document, separate document, with his correct signature?

A I believe so, yeah.

Q Do you happen to have it with you in your files?

A Do you have it with you in your files?

MR. BOGIN: Could we make a copy of that file?

MR. PARKER: Sure.

PERCAD CO., BAYONNE, N.J. 07002 · FORM 740

MR. BOGIN: As an exhibit?

MR. PARKER: Do you have any others, I mean --

MR. BOGIN: Nancy Radcliffe?

MR. PARKER: Yes, we got Nancy Radcliffe.

(There was a discussion held off the record.)

MR. BOGIN: American Express money order to Citizens for LaRouche for $70 by Charles Clark should be entered in as Commission Exhibit No. 25.

(Whereupon, Commission Exhibit No. 25 was marked for identification.)

Q I have in front of me, Travelers Express money order 29-26722, Citizens for LaRouche, for $250, signed with the signature -- looks to be Nancy Radcliffe, and I ask if you recognize that --

A Yes.

Q -- money order?

A I recognize it, I purchased it and I filled it out.

Q So where it's signed Nancy Radcliffe, that's really your signature?

A Right.

MR. BOGIN: Okay. I would like to enter Traveler's Express money order for Nancy Radcliffe into the record as Commission Exhibit No. 26.

PENN-AZ CO., BAYONNE, N.J. 07002 - FORM 740

(Whereupon Commission Exhibit No. 26 was marked for identification.)

Q I have in front of me Contributor information signed by the contributor, Charles Clark, saying he contributed $70 for Citizens for LaRouche on November 10, 1979. It's dated February 21st, 1980. I ask --

MR. CLARK: It says on or about, doesn't it?

MR. BOGIN: It's illegible but I assume that's what it says, on or about.

Q I ask if you can identify that document?

A I mailed this to New York, although I didn't get Charles' signature on it.

Q And do you remember when New York requested the document?

A No, I don't.

Q But you did get a phone call sometime subsequent to when you received the money order from New York saying that they don't have the documentation?

A Yes.

Q And they called you and they said, "Please get it?"

A Correct.

MR. BOGIN: Enter the contributor information from Charles Clark for Exhibit No. 27.

PENNAC CO., BAYONNE, N.J. 07002 · FORM 740

(Whereupon, Commission Exhibit 27 was marked for identification.)

Q I have in front of me another contributor information. This time from Nancy Radcliffe dated 2-28-80, of a $250 contributions to Citizens for LaRouche on or about September 10, 1979. Do you recognize that document?

A Yeah, I recognize it.

Q Did you fill out any of the information on that document?

A I don't think so.

Q Did you give it to Nancy Radcliffe to sign?

A Yeah, I remember this one specifically because she was in New Hampshire for two months campaigning. We had trouble getting in touch with her. She didn't sign it until she came back to Baltimore.

Q And did you hand it to her to sign?

A Yes.

Q Okay, and as far as you know, is that her address, 3215 North Charles Street?

A That's not her address any more. It used to be.

Q Now she lives --

A I told you she lives --

Q East 31st?

A 31st. I don't know where it's -- I mean I know where it is but I don't know the number.

PENROD CO., BAYONNE, N.J. 07002 - FORM 740

MR. BOGIN: I'd like to mark Contributor Information signed --

MR. PARKER: Between Calvert and Guilford, right?

THE WITNESS: Yeah.

MR. BOGIN: -- signed by Nancy Radcliffe, as Commission Exhibit No. 28.

(Whereupon, Commission Exhibit 28 was marked for identification.)

Q Commission Exhibit 26, did you purchase this money order for Nancy Radcliffe?

A Yeah, I said I did.

Q And, okay, do you realize that Nancy Radcliffe spells her name with an "e" at the end? Okay.

MR. PARKER: Does she?

THE WITNESS: I don't know if she does or she doesn't. I mean, but -- that's my handwriting. I'm not --

Q With the $250 money order for Nancy Radcliffe, did she give you cash?

A Yeah, she did.

Q Has she made other contributions to your knowledge?

A Yes.

Q Have they been by personal check?

A Some by check, some by her own personal check. I know she's made contributions on a joint account that she has.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Do you recall any reason why she contributed a money order in this instance?

A I don't know if she had a checking account at that time, but you'd have to ask her why she had cash. I don't know.

Q No. That's fine, just what your knowledge is. And she handed you the $250?

A Um-hum.

Q At some time prior to your going out and purchasing the check?

A Correct.

Q And you didn't ask her to give you the contributor information at that time when you got the $250 from her?

A I don't think I did at that time because I see her every day. I probably, you know, just figured we'd get it another time.

Q But then she left?

A She was in New Hampshire for a couple months.

Q January and February?

A Those were the big campaign months.

Q The money order was purchased on or about the 10th of September, so I was wondering why you couldn't get the information in September, October, November or December?

A I'll tell you. I mentioned before -- and I don't

PENGAD CO., BAYONNE, N.J. 07002 FORM 240

know whether she signed the letter early or not -- very often somebody does sign a letter and it's sent to New York and New York then calls us up and tells us they don't have the letter and they need the letter. So, I don't, you know, I honestly don't know. Nancy may have signed one earlier and this may be the second time she ever signed one. I just, I just don't know.

Q Is it your normal practice when you get a money order or a check to staple the contributor information with the signature where it's needed and information with the written instrument?

A We try to. We try to.

Q I have money orders here to Citizens for LaRouche from Steven Warm for $100 with his signature saying that he made the contribution. Do you recognize the money order?

A I actually recognize the letter. I don't recognize the money order.

Q You didn't purchase the money order?

A I don't think so. I don't know, really.

Q I have a Federal Express money order from Belinda F. deGrazia, Citizens for LaRouche and accompanying documentation. Do you recognize one or the other?

A Again, I recognize the letter. I am just not sure about these money orders to be perfectly honest.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q It's not your handwriting on the money orders?

A I don't think so.

Q You didn't purchase the money orders?

A I don't remember purchasing them, but I do remember the letters.

Q How do you remember it? What could you remember on them?

A Well, I remember -- you see, Belinda and Steve both worked for my campaigns.

Q Steve deGrazia?

A No, no, Steve Warm.

Q Oh.

A They both worked for my campaign.

He was my treasurer; she was my campaign chairman. So I recognize their signatures and I know their handwriting very well because we signed a lot of documents together. I recognize the letters but --

Q Oh, you recognize it as being their signatures?

A Yes.

Q But do you remember --

A Ever seeing the letter?

Q -- asking them to --

A No.

Q -- buy the money orders or supplying them with --

A No. All that stuff I don't recall.

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q Somebody else --

A It could have been. It also could have been me. I just don't remember and I don't want to tell you for certain if I'm not sure.

Q An American Express money order to Citizens for LaRouche from Rustom Ghandi. Do you recognize the money order?

A Yes, I do recognize that and that is my handwriting.

Q That's your handwriting?

A Yeah.

Q And was there accompanying documentation sent to New York with that money order?

A Yeah, as a matter of fact I think on that one the letter was signed simultaneously.

Q Do you happen to have it in your file?

A I don't think we have that one because he's not one of the people named. I only asked them for copies of the people who are named in the initial -- I only asked New York for copies of the individuals who are named in the initial stuff that you sent me.

Q But as far as you can recollect --

A There is a letter.

Q He signed a letter at about the same time --

A Yes.

Q -- that he made the contribution?

PENGAD CO. BAYONNE, N.J. 07002 - FORM 740

A Yeah.

Q But you purchased the money order --

A Yes, I did.

Q -- and filled out the information on this money order?

A Yes, I did.

MR. BOGIN: I'd like to enter American Express money order 55-466938409 into the record as Commission Exhibit No. -- little help, 29?

MR. PARKER: 29. Is that Ghandi?

MR. BOGIN: That's Ghandi.

(Whereupon, Commission Exhibit 29 was marked for identification.)

Q And I have here Citizens for LaRouche Contributor Information, a Federal Express money order by Constantine Philios. I ask if you recognize either the contributor information card or the money order.

A I think I recognized this, the contributor information card.

Q Why is that?

A I think I may have filled this out.

Q That's your handwriting on the contributor card?

A You know, I'm not absolutely positive.

Q But to the best of your knowledge?

A The thing that actually attracts my attention is

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

this. Iconcographer business.

Q For occupation?

A Yeah, because of a member getting money from someone who had a profession which struck me -- I never met anyone who did -- I don't even know really what it is, but I think I recognize this. I don't recognize that.

Q Did you purchase the money order for him?

A No, I don't think I did.

Q And that's not your handwriting or your money order?

A I don't think so. That's definitely not me.

Q Well, Citizens for LaRouche, where it says Citizens for LaRouche?

A Could be, but I honestly don't recognize it. I know I didn't purchase a money order.

MR. BOGIN: Okay. I would like to enter this as Commission Exhibit No. 29, which is --

MR. PARKER: 30.

MR. BOGIN: -- 30, which is Citizens for LaRouche information card and Federal Express money order 119691496.

(Whereupon, Commission Exhibit No. 30 was marked for identification.)

Q I have a personal money order from Equitable Trust Bank made out to Citizens for LaRouche. I can't read

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

the signature. Can you make that out?

A Sam --

MR. PARKER: Well, you can't do it.

THE WITNESS: No, I'm sorry, I can't make it out.

Q Do you recognize this written instrument --

A No, I don't.

Q -- in any fashion?

Do you know a Berthemos?

A No, I don't.

Q Do you know anybody by the name of Somes? First name.

A No.

Q Do you know anybody who lives on 514 South Oldham Street?

A I know where Oldham Street is. I don't know who lives there.

Q But you don't recognize that personal money order?

A No, I don't.

MR. BOGIN: I would like to enter this personal money order from the Equitable Trust Bank 1322084086 as Commission Exhibit No. 31.

(Whereupon, Commissioner Exhibit 31 was marked for identification)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

Q We went over these documents before. At the time I didn't mark them. They're Federal Express money order No. 119851803 from Belinda deGrazia, which I'd like to put in as Commission Exhibit No. 32, and Federal Express money order 119851804 and contributor information for Steven D. Warm, as Commission Exhibit 33.

(Whereupon, Commission Exhibits Nos. 32 and 33 were marked for identification.)

Q When Felice sent instructions down to you, did she use your home address?

A I've gotten stuff from Felice at home. I've gotten a personal visit.

Q Can she send it to you other than at home, any mail?

A She sends to me as a member of different places. I have two different work addresses.

Q Do you remember receiving instructions on how to fill out this contributor information at your home?

A Written instructions?

Q Right.

A Let me think for a second. I really don't remember.

Q You received instructions from New York on how to fill contributor information out.

PINGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I think so, yes.

Q Well, you have or vou haven't?

A Well, I've gotten verbal instructions and written instructions. Now, I don't know exactly what's been verbal, what's been written.

Q And you've given instructions to other volunteers on how to fill out the contributo information?

A On occasion.

Q Do you remember who you gave these instructions to?

A I've talked to Nancy Radcliffe about it. I've talked to Belinda deGrazia about it. I've talked to my husband about it. If there's any questions, I usually -- since I'm not an expert on this -- I just call Felice.

Q You said that you met Mr. Pulsifer at a hotel, Belvedere?

A Yeah, the hotel Belvedere, the Owl Bar.

Q And he gave you $150 at that time, a contribution?

A Yes.

Q Has he given you contributions any other time?

A I don't think so. He came to a fund raiser on December 9th, but I don't think he gave us any money. He certainly didn't give me any.

Q At the time he gave you the $150, you didn't ask him for the information, contributor information?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A No. I just asked him if I could get a money order for the thing. First I asked him for a check. He didn't have any. So, I said, "Is it okay if we get a money order and he'll sign a letter stating that he gave his money?" And he said, "Sure, no problem."

Q Did you send him anything for his giving you a contribution?

A No.

Q Did you ever send any of your contributors New Solidary Newspaper?

A I might have sent them clippings if they asked for them.

Q The book, Dope, Inc?

A No, I've never sent that.

Q Any books written by Linden LaRouche?

A Oh, yeah, on occasion.

Q To people who made contributions?

A Yeah, the books aren't sent to people in return. In other words, we don't sell them the books. I mean there are times that you know, if somebody has given me $100 contribution and they said they'd like to see a copy of Mr. LaRouche's book, I'm not going to say, give me three bucks. You know, I'll take a copy of the book and send it to them.

Q So at the time that he gave you the money you didn't

PENNAC CO., BAYONNE, N.J. 07002 - FORM 740

get his signature and the contributor --

A No, I didn't, at the time he gave his money.

Q And did you ever go get it subsequently?

A I know that we tried to get in touch with him. We asked him for it and I am almost sure but not positive that he did sign a letter for my husband, but, you know, I don't remember. I know we have a copy.

Q But you have no personal knowledge that he signed it?

A No. I mean I didn't see him sign it, for instance. Okay?

MR. BOGIN: What were you going to say?

MR. PARKER: I was just going to say that we're not going to waive signing the deposition. So if you'll notify me when it's ready.

MR. PONDER: Well, wait. Our understanding when we began this morning was that Ms. Freeman would give initial samples of the various things that we had to fill out but that she would then give the requisite number per item.

MR. PARKER: No, I'm talking about the deposition transcript.

MR. BOGIN: The waiving of the signature.

MR. PONDER: I understand, but I can't tell whether you think the deposition is over now or not.

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: Yes, I do think it's over.

MR. PONDER: Because you had said that you wanted to get this part done so that you could leave but that she could stay on and give us the number.

MR. PARKER: If you go back and read what I said, I said that we would let you know at the end of the deposition whether Mrs. Freeman had any objection to signing four additional copies of each one of the handwriting exemplars.

Mrs. Freeman feels that it's an impingement on her personal well-being to sign all those things. She's already signed ten, I think it is, exemplars which is more than enough for anybody, in our opinion, and she chooses not to sign any more.

MR. BOGIN: Now, at the time, we explained that we need --

MR. PARKER: I sincerely believe, a legal purpose that as I read the law, there's no right to even require a handwriting exemplar. There are certain criminal statutes which make that necessary, but certainly they are not included in Section 473-D of the Act.

MR. BOGIN: 437D?

MR. PARKER: 437D.

MR. PONDER: Are you saying that you want to go to Court to test this? I mean we --

PIGEON CO., BAYONNE, N.J. 07002 - FORM 740

MR. PARKER: We dont' want to go to Court with anybody. This thing is a terrible imposition on Mrs. Freeman. Her word is outrageous. It's extremely expensive and if you think that you can get a District Court Judge in the State of Maryland to require her to sign five copies of those ten items, then you're welcome to it and we'll take that up --

MR. PONDER: Well, we think we can. It's easier for you to go ahead and give the samples that we've explained we need now than for us to go fight over this.

MR. PARKER: If you think it will be an interesting test then we'll see if the Commission and others feel that that's the type of thing that ought to be engaged in.

I mean I don't think it's part of the law.

Now, we voluntarily gave you ten without objecting to it and you have them.

In any event, Mrs. Freeman will not waive signing the deposition and when the transcript is ready, if you'll call us, we'll make arrangements to read and sign it.

MR. BOGIN: For the record, I'd like to state that it was the understanding of the Federal Election Commission that they would take the handwriting samples of Debra Hanania Freeman after asking the questions in order not to waste her attorney'S valuable time at the deposition,

PINKAU CO., BAYONNE, N.J. 07002 - FORM 740

that it was our understanding then at that time that Ms. Freeman would cooperate and write out copies of all the samples that she's already written so that we'd have a total of five. And it was explained at that time that in order to have a viable sample we needed five of each sample that we requested.

In addition, counsel has now stated for the record that he doesn't think as a matter of law that it's required that the samples be taken and that it's our understanding that he refuses to have Mrs. Freeman sign these documents.

I'd like to ask Mrs. Freeman, do you refuse to sign any further handwriting samples?

MR. PARKER: You don't have to answer that question.

THE WITNESS: I choose not to answer it.

MR. BOGIN: On the advice of counsel, Ms. Freeman has chosen not to answer. We will take that to mean that she refuses to sign any further documents and our only recourse now is to enforce this aspect of the subpoena asking for the handwriting samples in the District Court.

MR. PARKER: Fine. It's all on the record. Just make sure that we get a chance to sign the deposition before you release it.

(Whereupon, the deposition was concluded.)

Debra Hanania Freeman (Deponent)

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Susan D. Ashe, a Notary Public in and for the State of Maryland, County of Anne Arundel, do hereby certify that the within named, DEBRA HANANIA FREEMAN, personally appeared before me at the time and place herein set out and after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulation contained herein was entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

As Witness, my hand and Notarial Seal, this ____ day of August, 1980, at Baltimore, Maryland.

_____
Notary Public

PENNAD CO. BAYONNE, N.J. 07002 - FORM 740

January 28, 1981

STATE OF MARYLAND

CITY OF BALTIMORE: SS

I, Richmon C. Gore, Jr., a Notary Public in and for the State of Maryland do further certify that Debra Hanania Freeman was notified by letter dated August 29th, 1980 that her deposition was completed and available in my office for reading and signing by her and that to date she has failed to appear or communicate with me. Having failed to comply with the Maryland Rules allowing thirty days for this purpose, I hereby return the original to counsel.

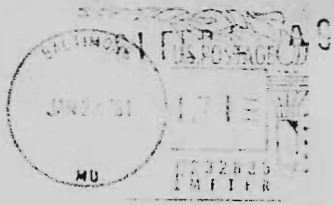
Richmon C. Gore. Jr.

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

171

GORE BROTHERS REPORTING COMPANY
225 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

13040372921



Federal Election Commission
1325 K St., N.W.
Washington, D. C. 20463
Attn: Mr. Bogin

2/28/80
(date)

I contributed $ 250.00 (amount) to Citizens for LaRouche on
9/10/79 (date). This contribution was from my own personal
funds and not drawn on an incorporated account.

signed

Nancy B. Radcliffe
(signature)

5315 W Charles St. Apt 206
(address)

Baltimore MD 21227
(City) (State)

FEC FORM 3

NANCY RADCLIFFE

RECEIVED

80 SEP 9 A8:45

ATTACHMENT #2

page 1

Travelers Express Money Order 189 2926722

TRAVELERS EXPRESS COMPANY, INC.

SEP 14 1979

DATE Sept 12, 1979

PAY TO THE ORDER OF Citizens for Mahoney

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

3809 1:S250.00

AMOUNT

SUBJECT TO CONTRACT REFERRED TO ON REVERSE

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF MINNEAPOLIS

Nancy Radcliff

PURCHASER SIGNER FOR DRAWER

3215 N Charles - Balto 21218

PURCHASER'S ADDRESS

:091900533:189 2926722" 40

FEC Ex. No. 1
5-15-81 PG

ATTACHMENT #2
PAGE 2

NANCY RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST., APT. 206
BALTIMORE, MD. 21218

NO. 234

December 3 19 79 7-09 320

PAY TO THE ORDER OF CFL $ 20.00

Twenty and no/100 DOLLARS

The Equitable Trust Company
BALTIMORE, MD

Nancy Radcliffe

12-11-79 11

B.L.T.

NANCY B. RADCLIFFE
ROBERT PRIMACK
3215 NORTH CHARLES ST., APT. 206
BALTIMORE, MD. 21218

NO. 235

December 9 19 79 7-09 320

PAY TO THE ORDER OF Citizens for LaRouche $ 85.00

Eighty Five and no/100 DOLLARS

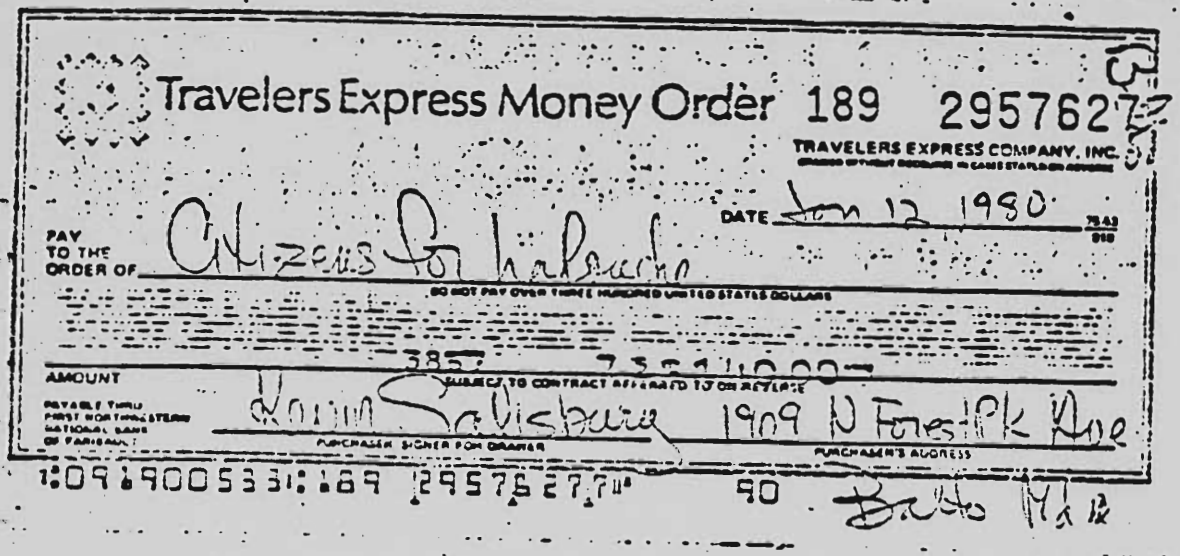
The Equitable Trust Company
BALTIMORE, MD

Nancy B. Radcliffe

FEC EX NO. 2
4-6-80

ATTACHMENT #3
page 1

DATE 1-15-80 DEPOSIT CODE 1-2



Travelers Express Money Order 189 2957627

TRAVELERS EXPRESS COMPANY, INC.

DATE Jan 12 1980

PAY TO THE ORDER OF Citizens for Salisbury

DO NOT PAY OVER THREE HUNDRED UNITED STATES DOLLARS

385 735 110.00

AMOUNT

SUBJECT TO CONTRACT AS STATED TO OR RECEIPT

PAYABLE THRU FIRST NORTHWESTERN NATIONAL BANK OF FARIBAULT

Robin Salisbury 1909 N Forest Pk Ave

PURCHASER SIGNER FOR DRAWER

PURCHASER'S ADDRESS

1:09190053 31:189 2957627 7" 90

DATE 1-15-80 DEPOSIT CODE 1-2

RECEIVED
1-15-80 PC

ATTACHMENT 3
Page 2

FEDERAL EXPRESS MONEY ORDER

114504323 64-79 611

PAY THE SUM OF $450.00

PAYABLE TO Citizens for LaRouche

FROM Kevin C Salisbury

ADDRESS 1909 Forest Park ATP T-3

CITY Balt STATE MD ZIP CODE DATE 1-21-80

NOT VALID OVER $500.00

FEDERAL EXPRESS SERVICES CORP.
AN FDC COMPANY
DRAWER-DRAWEE

:061100790: 114504323 4#

DATE 1-23-80 DEPOSIT CODE 1-2

January 21, 1980
(date)

I contributed $ 450.00 to Citizens for Larouche on

January 21, 1980
(date)

signed

Kevin C Salisbury

DATE _____ DEPOSIT CODE _____

1909 FOREST PARK ATP T-3
(address)

FEC EXH 2
3-15-80 SC

BALTIMORE MARYLAND

ATTACHMENT # 1
page 1

Date 1/23/80 Code 1-3 5.00

CONTINENTAL BANK

Household Finance
Consumer Finance Division

0175

2-3
710

ZC NO.	DATE	ACCOUNT	AMOUNT
75	01/22/30		$*1,009.58 ←PAY

BALTIMORE, MARYLAND NC. 4
NOT VALID FOR MORE THAN $10,000.00

DAVID SANDERS

L. A. Wall

⑈5110401750⑈ ⑆071000039⑆ 50⑈06953⑈

FEC Form 1
FEC 5-15-78 Page 1

ATTACHMENT #1
page 2

For the sum
of Eighty for
Lyndon.
Dick Tuck

CITIZENS FOR La ROUCHE
CITIBANK

Date 1/23/80 Code 1-3

FEC EXHIBIT 2
1-15-80 G

ATTACHMENT #1
= page 3

January 22, 1980
(date)

I contributed $1,029.58 to Citizens for Larouche on

January 22 1980
(date)

signed

Lenore Sanders

David Sanders
(signature)

613 St. Anns Ave

613 St. Ann's Ave
(address)

Baltimore Md.

Baltimore, Md.
(City) (state)

Lenore Sanders (spouse)

David Sanders

613 St. Anns Ave

Baltimore Md.

FEC EX. No. 3
2-15-80 OA

ATTACHMENT # 1
- page 4

FEDERAL EXPRESS MONEY ORDER

113833058

NOV 28 1979

PAY THE SUM OF 50-014 FEDERAL EXPRESS 45 DOLS 00 CTS

02

PAYABLE TO Citizens for Schmoke

NOT VALID OVER $500.00

FROM David Sanders

ADDRESS 613 St Ann Street

CITY Balt STATE Md ZIP CODE 21218 DATE 11/25

FEDERAL EXPRESS SERVICES CORP
AN NCR COMPANY
DRAWER - DRAWEE

:061100790: 113833058 74

FEC Ex. No. 4
7-15-1980

ATTACHMENT #1
page 5

December 28, 1979

Dear Citizens for LaRouche:

This is to certify that I did personally contribute $45 in the form of a money order payable to Citizens for LaRouche on November 28, 1979.

Sincerely,

David Sanders

David Sanders
613 St. Ann Street
Baltimore, Maryland 21218

FEC Exh. 5
2-1C-SCPC

ATTACHMENT #1
page 6

DATE 1/4/80 DEPOSIT CODE 1-1

Att. 1. p. 6

AMERICAN EXPRESS MONEY ORDER 23-1 1020

55-467,316,467

Balt.

PAY THE SUM OF
NOT GOOD OVER $200.

DATE 1/3 19 74 SUM 25 DOLS 00 CTS

TO THE Prince Fred. Co. Police

David Sanders 613 St. Ann St. Balt. Md. 21205
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑈1020⑈000⑆55 ⑈467316467⑆⑈

FCC BY [illegible]
5-15 80 JC

1/12/79
(date)

I contributed $ 70 00 to Citizens for LaRouche on

11/12/79
(date). This contribution was from my own personal

funds and not drawn on an incorporated account.

signed

Charles Clark
(signature)

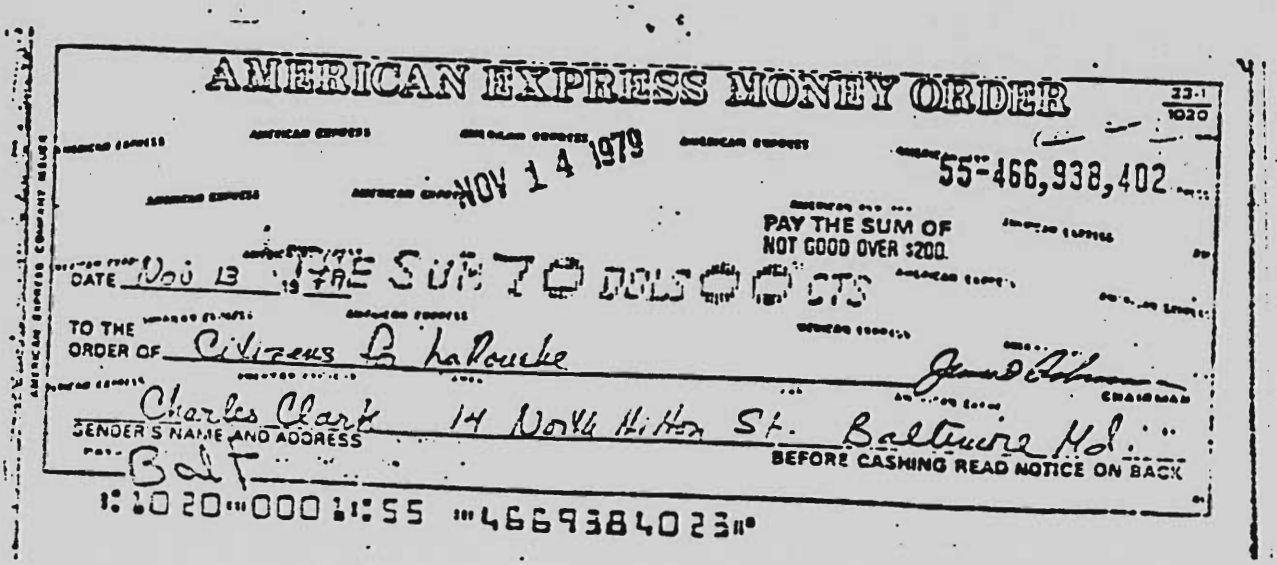
[illegible]
(address)

[illegible]
(city) (State)

CHARLES CLARK

ATTACHMENT #5

page 4



AMERICAN EXPRESS MONEY ORDER

33-1
1020

NOV 14 1979

55-466,938,402

PAY THE SUM OF
NOT GOOD OVER $200.

DATE Nov 13 19 79 THE SUM OF DOLLARS CTS

TO THE ORDER OF Citizens LaRouche

Charles Clark 14 North Hilton St. Baltimore Md.
SENDER'S NAME AND ADDRESS

Balt

BEFORE CASHING READ NOTICE ON BACK

⑆1020⑆000⑆55 ⑈4669384023⑈

FEC [illegible]
8-15-80 PO

912020

GCC#3827

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF :

MUR 1158 :

- - - - - -

Pursuant to notice, the deposition of NANCY RADCLIFFE, was taken on Friday, August 15th, 1980, commencing at 10:00 o'clock a.m., at the United States Attorneys Office for the District of Maryland, 8th Floor, Federal Court House, Baltimore, Maryland, 21202, before Phyllis Goldstein, a Notary Public.

- - - - - -

APPEARANCES:

Robert I. Bogin, Esquire,
On behalf of the Federal Election Commission

Marsha Gentner, Esquire,
On behalf of the Federal Election Commission

Peter Parker, Esquire,
On behalf of Witness, Nancy Radliffe

Also Present:

Debra H. Freeman
Felice Gelman

Reported by:

Phyllis Goldstein

PENNAR CO., BAYONNE, N.J. 07002 - FORM 740

I N D E X

WITNESS:	PAGE
Nancy Radcliffe	3

PRINTED IN BAYONNE, N.J. 07002 FORM 740

PROCEEDINGS

MR. BOGIN: This will be the deposition of Nancy Radcliffe. Before we start, but for the record, we have Nancy Radcliffe and Peter Parker, her attorney; Debra Freeman; and Felice Gelman. The deposition is for Nancy Radcliffe, and Mr. Parker represents her. It is the position of the Federal Election Commission that both Ms. Freeman and Ms. Gelman will not attend the taking of this deposition. Apparently, they would like to place a statement on the record why they should be.

MR. PARKER: Before that happens, what is the basis of your decision or position that they cannot be here?

MR. BOGIN: Well, we are an investigatory agency. We would like to take the deposition of Ms. Radcliffe and get it for the record. She is only a witness. There is no need at this time, there is no place in our Act or at this investigatory stage for confrontation by the respondent, or certainly, I don't even know why Ms. Gelman is here. I assume she represents Citizens for LaRouche. They are not a party to this action at this point in time, if ever. Certainly, it's not appropriate for her to be here. Ms. Freeman is not to be here either; but, of course, you are her attorney. You will be able to because you represent Ms. Freeman and the witnesses, and you certainly will have access to the deposition - testimony.

MR. PARKER: Well, my point is this. As far as Ms. Freeman is concerned, she has been delineated as the target or the subject of the investigation MUR 1158, which is why we are here for this deposition. It seems to me, under the Constitution, there is the right to face your accusers. She is entitled as a matter or process to be present, and I can't see what possible difference it would make, is she is free to read a copy of the deposition following its transcription, why cannot she be here to hear what is being said?

MR. BOGIN: I didn't say she would be free to read the deposition. It is because you are the attorney she is going to have access to this information. However, we are an investigatory agency. This due process argument, it is not like we are in Court or have made a civil action. This is part of the investigation.

We have run across -- we have been upheld in this position in a recent case in New Hampshire in the Federal Election Commission versus Dudley, which said any investigatory agency can depose an individual without any other people in the room besides her attorney.

MR. PARKER: Well, you are saying that, for the record, that the Citizens for LaRouche is not a subject of this investigation?

Mr. BOGIN: There have been no findings at

PERLAD CO., BAYONNE, N.J. 07002 - FORM 740

this time concerning Citizens for LaRouche. The only finding at this time has been MUR 1158 where there was proper finding and notification given to Ms. Freeman.

The other people here are not subjects of an inquiry, per se, at the moment.

MR. PARKER: As far as Citizens for LaRouche is concerned, you are saying the subject of this inquiry does not involve them. It involves Ms. Freeman.

MR. BOGIN: While it may eventually lead to them, that is part of why we are investigating, but certainly there has been no finding at this time.

This is Ms. Gelman, Treasurer of the Citizens for LaRouche.

MS. GELMAN: Let me indicate my view on the situation, which is the following: Mr. LaRouche's contributors, both in this campaign and in his campaign in 1976, which I was not personally involved in, have repeatedly been the target of broad-scale inquiry by the Federal Election Commission.

That inquiry has not been limited to one or two individuals. It has been on a broad scale. The Federal Election Commission contacted over 200 of the Citizens For LaRouche contributors during this campaign.

They paid surprised, unannounced visits by investigators in 1976 to contributors.

PENNAC CO., BAYONNE, N.J. 07002 - FORM 740

As Treasurer of the Citizens for LaRouche, I am well aware of the fact that the sweep and scope of the FEC's inquiries, most of which were not really being targeted towards any particular investigation as far as I am able to discern, have had a remarkably chilling effect on our ability to recruit political contributors and recruit political volunteers, all of whom tend to believe at this point, that should they make a contribution to Citizens for LaRouche, they will become the subject of inquiry, investigation; that they may be called to answer questions; that they may be deposed.

Now, in this situation, there are four individuals who have been repeatedly called, have been required to take time off from their employment to attend a deposition as witnesses in a matter which in fact concerns the submission of their contributions for matching funds.

Citizens for LaRouche was never notified that these people were being contacted. In fact, it has affected their relationship to the campaign and their willingness to make further contributions or to provide any additional support to Mr. LaRouche, and I think that particularly, in a case where the FEC is saying that Citizens for LaRouche is not a target of the investigation, that we have the right to determine how the FEC is actually conducting

themselves toward our contributors so that we have some ability to take care of the evil effects of their interest in such a large number of people so far.

I would also like to point out that there is litigation going on concerning the FEC's approach to Mr. LaRouche's contributors, which stem from the 1976 campaign, and the guidelines, approach, subject matter, et cetera, their investigation and its effect upon the contributors is a matter that is under litigation in the case.

Now, we are not talking about a current matter, but we are talking about the approach the FEC has taken to Mr. LaRouche. I think we have an interest in safeguarding their privacy and insuring that the FEC does not conduct itself as it did then in harassing people and causing them undue problems. That is really our interest in attending the deposition.

MR. BOGIN: The Federal Election Commission is charged with the responsibility of enforcing the Federal Election Campaign Act of 1971 as amended that gives it broad powers, but in a certain confined procedural process which it must follow. The Commission has made a finding of reason to believe concerning an individual, and it can pursue that violation to the extent necessary. It is recognized that sometimes this will have certain effects, but the Commission must proceed to enforce and to uphold

PENNSYLVANIA BAYONNE, N.J. 07002 · FORM 740

its responsibilities under the law.

We try to do this in a manner that brings in and involves the fewest number of people, tries to be concise, tries to do everything it can to make sure it does not harass or unduly burden any individual. In this matter, there was a finding of reason to believe with a full notification of why, and --

MS. GELMAN: But Citizens for LaRouche is not responsible for that.

MS. GENTNER: He didn't interrupt your statement. Please don't interrupt his.

MR. BOGIN: There has been no objection by the respondent or her attorney that we are going outside the scope of the relevancy of our investigation for that matter, and that is why we are now going to proceed with the deposition of the witness. Citizens for LaRouche has no place at this deposition.

MS. GELMAN: I have no objection whatsoever to your proceeding with the investigation, and that is not the reason I said I wanted to attend it. I wanted to attend it because it's a matter of the First Amendment involved in the relationship between us and our contributors. There is nothing wrong with the FEC pursuing its investigation. There is nothing wrong with them questioning people, but there has been a history of past practice which has

PENNAS CO. BAYONNE, N.J. 07002 FORM 740

developed an attitude among our own contributors, and that's my interest in the matter.

MR. BOGIN: There are confidentiality provisions in our Act.

MR. PARKER: But that only relates to Mrs. Freeman, who is waiving.

MR. BOGIN: And it also relates to the Federal Election Commission, who has not waived its right for keeping this matter confidential, and in fact, it is imperative in its investigation that it have confidentiality in its investigations; otherwise, we would just not be an effective agency.

MR. PARKER: Well, it is your position that you refuse to go forward with the deposition if Felice Gelman and Debra Freeman remain right here?

MR. BOGIN: That's right.

(Felice Gelman and Debra Freeman were excused from the deposition, and a brief off-the-record discussion was had.)

- - - - - -

PRINTED BY BAYONNE, N.J. 07002 - FORM 740

NANCY B. RADCLIFFE,

a witness, called for examination by the Federal Election Commission, after having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION BY MR. BOGIN:

Q May we have your full name for the record?

A My name is Nancy Bowie Radcliffe.

Q And how do you spell Radcliffe?

A R-a-d-c-l-i-f-f-e.

Q And your present address?

A 308 East 31st Street, Baltimore, Maryland, 21218.

Q How long have you lived at this address?

A Seven months.

Q And before that time, what was your address?

A 3215 North Charles Street, Apartment 206, Baltimore, Maryland, same zip code.

Q And your occupation?

A Administrative Secretary.

Q What is your place of employment?

A Johns Hopkins.

Q How long have you held that position?

A Five months.

Q And before that time, what was your occupation -- I mean -- your principal place of business?

PENNSYLVANIA HAVENNI, N.J. 07002 - FORM 740

A The Baltimore Sunpapers.

Q What was your job with the Baltimore Sunpapers?

A Computer data entry.

Q You didn't sell papers?

A No.

Q You worked for the headquarters, the main office of the Baltimore Sunpapers?

A Yes.

Q Is that located on Calvert and Charles Street?

A It's on Calvert and Centre Streets.

MR. PARKER: Calvert and Charles are parallel.

Q And how long were you working for the Baltimore Sunpapers?

A For a year, one year.

Q Do you know of, or know a man named Lyndon LaRouche?

A Yes.

Q How do you know him?

A Through reading literature he has written. Through watching television broadcasts.

MR. PARKER: When you say know, do you mean know him personally?

MR. BOGIN: Know of him or know him. We will develop what that means.

A Okay, thank you. How I know him.

Q Through literature and television broadcasts?

PLYMOUTH HAVERNE N.J. 07002 - FORM 740

A Yes.

Q You have never met the man?

A No. I have, yes.

Q When was the first time you heard of him? Do you remember approximately what year you heard of him?

A 1974.

Q And in 1974, how did you come to hear of him?

A The same way.

Q Through reading literature?

A Correct.

Q Did anybody give you that literature? How did you come across the literature?

A I bought the literature on LaRouche, and somebody gave me the literature on LaRouche in '74.

Q '74?

A Uh-huh.

Q Do you know what Mr. LaRouche is doing in the year 1980?

A He campaigned for the President of the United States.

Q Did you work for his campaign?

A I volunteered, yes.

Q How much time, would you say, a week did you volunteer?

A It varied.

Q Give me some approximations.

MILLER CO. BAYONNE, N.J. 07002 - FORM 740

A Some weeks a few hours. Some weeks more hours. It varied, depending on my work schedule.

Q Did you ever work 40 hours a week for him at any stage of this?

A No.

Q Twenty hours?

A Maybe twenty.

Q How did you come to volunteer for him? Were you recruited?

A What do you mean, recruited?

Q Did somebody come and ask you to help volunteer for the campaign?

A No, I volunteered for the campaign.

Q Who did you volunteer to? Who did you contact?

A His campaign staff.

Q Could you tell me who the campaign staff is? Who personally did you contact in the campaign staff?

A Several people.

Q Can I have some names?

A Of the campaign staff?

Q Right, that you contacted?

A Well, for one, are you talking about 1980, or are you talking about --

Q 1980.

A 1980; Lawrence Freeman, Debra Freeman and several others.

PICCARD CO., BAYONNE, N.J. 07002 - FORM 740

Q So when you wanted to volunteer your time, did you call up Mr. Freeman and say, "I would like to volunteer my time"?

A No. I just volunteered my time. It was not formal -- you know -- I call up and say, I want to volunteer my time.

Q How do you know Mr. Freeman?

A How do I know Mr. Freeman. I have known him through the campaign. Since, you know, I have known LaRouche.

Q From 1974?

A Yes. I have known him for a while.

Q Where is the campaign headquarters in Baltimore.

MR. PARKER: Was.

A Was. Well, LaRouche himself did not have a campaign headquarters. We met in different places.

Q When you did work, what kind of work did you do for the Committee?

A Campaign work, you know, petitioning, leafleting.

Q Did you solicit contributions?

A Yes, at times.

Q Did you receive contributions from individuals?

A Yes, occasionally.

Q When you received a contribution from an individual, what did you do with the contributions? Who did

PINKAD CO. BAYONNE, N.J. 07002 · FORM 740

you give it to?

A To our New York office.

Q You sent it up there directly to New York?

A Well, I'm just trying to remember. I don't remember.

Q Did you ever send it up directly to New York -- contributions that you received?

A Yes. There were times when I did, yes.

Q Where would you go from there, physically, where was your --

A From the Post Office, Central Post Office down here.

Q Give me a scenario of what happened, this collection of contributions. You would receive a contribution from somebody who was interested in contributing to the LaRouche campaign?

A No, my main job as a volunteer was to disseminate campaign literature.

Q Who would give you the literature to --

A I would get the literature.

Q From whom?

A From campaign workers and other volunteers. There are many volunteers.

Q Do you know Debra Freeman?

A Yes, I know Debra.

PLIMPTON CO., BAYONNE, N.J. 07002 - FORM 740

Q How long have you known Debra Freeman?

A I have known Debra since either '74 or '75.

Q Have you ever made any contributions yourself to the Lyndon LaRouche campaign?

A Yes.

Q How many have you made?

A I don't remember.

Q Approximately.

A Approximately four, five.

Q Totaling about how much money?

A I don't remember.

Q Approximately.

A I don't remember.

Q In what form did you make these contributions?

A Different forms.

Q Did you make contributions by personal check?

A Yes.

Q By money order?

A Yes.

Q Do you have a checking account?

A Yes.

Q Is this checking account in your own name?

A Yes.

Q Approximately how much money do you make in a year?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A I would like to talk to my lawyer. I am not going to answer that.

Q Could you tell me why you are not going to answer that?

MR. PARKER: I instructed her not to answer it. That is why. It has nothing to do with the subject of this investigation.

MR. BOGIN: Well, the Federal Election Commission has asked the question of approximately how much money the witness makes in a year. It is relevant in the sense of determining her capacity to make contributions.

Based on that explanation, do you still refuse to answer the question?

MR. PARKER: Yes. She makes considerably more than the contributions which she made.

MS. GENTNER: Is that the witness' answer?

A Yes. That is my answer.

Q When you made a contribution to Citizens for LaRouche, who did you give the contribution to?

A I don't remember.

Q Did you ever give cash contributions to Citizens for LaRouche?

A Yes, I gave cash and check contributions.

Q I have here a money order, Traveler's Express Money Order, payable to Citizens for LaRouche in the amount

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

of $250. Do you recognize this money order?

A That is the contribution I made in cash to Citizens for LaRouche.

MR. BOGIN: I would like to mark this Traveler's Express Money Order No. 2926722, payable to Citizens for LaRouche for $250 as Federal Election Commission Exhibit No. 1.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Federal Election Commission Exhibit No. 1.)

Q And who did you give this $250 to, this cash contribution?

A I gave it to Debra Freeman.

Q And why did you give her $250 in cash?

A Because I didn't have $500 in cash.

Q Why didn't you write out a check?

A Because I had the cash.

Q Is this your handwriting on this money order?

A No.

Q That is not your signature, Nancy Radcliffe?

A No.

Q In fact, is Nancy Radcliffe spelled correctly?

A No.

Q What is the misspelling?

A There is no "E" on the end. That is a common mistake.

Q Have you ever seen this Traveler's Express Money Order payable to Citizens for LaRouche before today?

A Yes.

Q When did you see it?

A When I made the contribution.

Q Could you explain the transaction, how it occurred?

A I explained it.

Q No, you didn't. You said you made a $250 cash contribution.

A And I gave the money to Debra Freeman. Debra Freeman got a money order.

Q Did you go to the bank with her to get the money order?

A No.

Q When did you see the money order?

A After she got the money order.

Q The same day that you gave her the $250?

A I don't remember if it was the same day.

Q How come you didn't fill it out if you saw the money order?

A I don't remember.

Q When did you see the money order?

BRIGANTI CO. BAYONNE, N.J. 07002 FORM 740

A I told you, after I gave her the money.

Q But not the same day?

A I don't remember.

Q And it was filled out when you saw it?

A Yes.

Q Why was it that you saw the money order? Why did Ms. Freeman show it to you?

A I don't remember.

Q How do you remember seeing it?

A I remember seeing it when other checks and money orders, **campaign contributions.**

Q To be sent up to Citizens for LaRouche in New York?

A Right, correct.

Q So, did you mail this money order up to New York?

A I don't remember.

Q Let's go over the testimony. Did you give Ms. Freeman the $250 in cash?

A Yes.

Q Then this was intended as a contribution to Citizens for LaRouche?

A Right.

Q Ms. Freeman went out and purchased this money order herself?

PENCAD CO., BAYONNE, N.J. 07002 - FORM 740

A Correct.

Q How do you know that Debra Freeman bought the money order?

A She told me she did.

Q When you gave her the $250 in cash, did she say, "I am going to go out and buy a money order"?

A Yes.

Q Why didn't you go out and buy the money order?

A I don't remember.

Q I have in front of me two personal checks signed by Nancy B. Radcliffe and Nancy Radcliffe, numbers 234 and 235. Do you recognize these two checks?

A Yes.

MR. BOGIN: I would like to mark this Deposition Exhibit No. 2, No. 234 and 235 that has the name of Robert Primack on it and the address of 3215 North Charles Street.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Deposition Exhibit No. 2.)

Q Looking at these checks, I see your name is printed on the top.

A Uh-huh.

Q Could you explain?

PRIMAS CO BAYONNE, N.J. 07002 - FORM 740

A I printed my name on the top.

Q Was this a joint account?

A Yes.

Q It was your funds in this account?

A Yes.

Q Before, you said you were living at 3215 North Charles Street, and that is the address that is on the check?

A That is correct.

Q Who is Robert Primack?

A Who is he?

Q Yes, I mean how do you know him?

A I know him through the campaign.

Q Is he a campaign worker?

A I don't know.

Q What does he do for a living?

A I don't know.

Q How do you know him through the campaign?

A I met him through the campaign.

Q Doing what?

A Campaigning.

Q And then you lived in the same house that he did?

A That is correct, same address.

Q At the same address. Was it a group house?

A It is at the same address.

Q You cannot tell me if he works for the campaign?

A I don't know.

Q But you lived at the same address?

MR. PARKER: When you say work for the campaign, do you mean as an employee?

A Do you mean now?

Q At the time that you made this contribution and were living at the same address.

A At the time I made the contribution, he was working for the campaign.

Q Do you know if he was a paid worker for the campaign?

A I don't know.

Q Was he a volunteer?

A Yes.

Q Was there a central location where you could meet other volunteers for the Citizens for LaRouche Campaign?

A In Baltimore?

Q In Baltimore.

A We met in several places.

Q Could you tell me those places?

A We met in churches, we held some meetings. I remember some at the University of Baltimore, some at different campuses, at Hopkins, several places.

Q Did you ever meet at people's homes?

A Yes.

Q Did you ever meet at 3215 North Charles Street?

A No.

Q Did you ever meet at the Freeman's residence?

A Maybe once or twice.

Q Where were the files that --

A I don't know.

Q You said before that you sent contributions to New York. There must have been files associated with that. Where were they kept?

A Associated with mail? I don't know.

Q Well, I want to talk about these contributions you sent to New York. Did you just send checks or did you send contributor information?

A I said there was only an occasion or two when I did, and it went express mail.

Q Where did you pick up the contribution from?

A Where did I pick up the contribution? In my campaigning.

Q In your campaigning. In the street somebody would give you a contribution.

A That would happen, yes.

Q Did you have to get contributor information from that person like their name, their address?

A I had their name and their address.

Q Did you ever have to find out where they worked?

A No. The contributions weren't large enough, but I did find out information like that.

Q Did you send that to New York, that information?

A I don't remember.

Q So, you got contributions on the street, and then you went to the Post Office with it and sent it to New York?

A Sometimes.

Q And what about those other times? Would you ever tell anybody in Baltimore that you got a contribution?

A I would tell campaign workers.

Q Would you tell Debra Freeman?

A Yes.

Q Would you tell her on every contribution that you got?

A I don't remember.

Q Would you tell Larry Freeman?

A Sometimes.

Q Would you tell Robert Primack?

A Sometimes.

Q Do you know Kevin Salisbury?

A Yes.

PENNSAUKEN, N.J. 07002 · FORM 740

Q Is he a campaign worker?

A He is a campaign contributor.

Q But you wouldn't classify him as a volunteer for LaRouche?

A He has done some work, yes -- not much.

Q How about David Sanders.

A I know David Sanders.

Q Is he a volunteer for LaRouche?

A No.

Q Charles Clark. Do you know him.

A Yes.

Q Is he a contributor?

A Yes.

Q Is he a volunteer for Citizens for LaRouche?

A He does some work, not much.

Q How do you know that Charles Clark is a contributor to Citizens for LaRouche?

A How do I know?

Q Uh-huh.

A Because I know him as a contributor.

Q Did he give you a contribution?

A No, not that I remember.

Q So what was the basis for knowing that he was a contributor?

A He told me.

PLAZA 10 BAYONNE, N.J. 07002 - FORM 740

Q He told you that he was a contributor?

A Yes.

Q What about David Sanders? How do you know he was a contributor to the Citizens for LaRouche?

A The same way.

Q He told you?

A Uh-huh.

Q These conversations where they told you, when were they?

A I don't remember.

Q Is all the money that you contributed to Citizens for LaRouche your own money?

A Is the money I contributed to Citizens for LaRouche my money? Of course.

Q Have you ever heard of a matching funds program?

A Yes.

Q Are you instructed -- have you ever been instructed on how to get contributions for Citizens for LaRouche?

A On how to get contributions.

Q What information you must get from a contributor? How much you may accept?

A Yes.

Q And who gave you those instructions?

A I guess Debra, other campaign workers.

PTS-33 (O BAYONNE, N.J. 07002 FORM 740

Q Debra Freeman and others?

A Uh-huh.

Q Were they ever written?

A I think I recall that they were, but I don't remember. I think they were.

Q Before today, had you ever met Felice Gelman?

A Yes.

Q When was the first time you met her?

A Several years ago.

Q Have you ever received money from Debra Freeman?

A Have I received money from Debra Freeman? No.

Q Have you ever received money from Larry Freeman?

A No.

Q Have you ever received money from Robert Primack?

A No.

Q Have you ever been reimbursed for making a contribution?

A No.

Q Did Ms. Freeman tell you to get Peter Parker as an attorney?

MR. PARKER: I object. I instruct the witness not to answer.

MR. BOGIN: Could you give me the basis, please?

MR. PARKER: You cannot inquire into how she came

to retain an attorney.

MR. BOGIN: I think it is relevant in terms of the fact that the respondents in this matter --

MR. PARKER: I am instructing the witness not to answer. I have never heard of such an incredible question.

Q Do you refuse to answer the question?

A Yes.

Q Are you paying Mr. Parker to represent you?

MR. PARKER: Objection. I instruct the witness not to answer.

MR. BOGIN: What is the basis for the objection?

MR. PARKER: The same. You cannot inquire as to the relationship between a client and an attorney.

Q Do you refuse to answer that question?

A Yes.

(Whereupon a brief off-the-record discussion was had.)

MR. BOGIN: Back on the record.

Q I show the witness Commission Exhibit No. 1, which is the money order for $250.

You said you testified before that, at the time you gave Ms. Freeman $250, she said she was going to buy a money order; is that correct?

A That is correct.

PENNSAUKEN, N.J. 07002 - FORM 740

Q How come that is not your signature on this money order?

A You asked me that before.

Q Yes, and what was the answer?

A I said I don't remember.

Q Did you know that you were going to see this money order when she purchased it?

A I don't remember.

Q You do remember giving her the $250?

A Yes.

Q And you do remember her saying that she was going to purchase the money order?

A Yes.

Q And what else did she tell you at that time about purchasing the money order?

A That is it, that I remember.

Q Have you ever, subsequent to giving the $250, signed any document saying that you made a $250 contribution?

A Yes, I did. I think -- I am sure I did.

Q When?

A When? I don't remember the date.

Q Was it last month?

A No.

Q Two months ago?

PENSAD CO. BAYONNE, N.J. 07002 - FORM 740

A I don't remember.

Q Well, let's see if you can remember.

MR. PARKER: Here is a copy of the letter she reportedly signed.

A That is my signature.

Q Off the record.

(Whereupon, a brief off-the-record discussion was had.)

MR. BOGIN: Back on the record.

Q Mr. Parker has given me a document which the Federal Election Commission does not have possession of, as far as I know, dated 2-28-80. The document says you contributed $250 for Citizens for LaRouche and in handwriting, on or about 9-10-79.

A This contribution was from my own personal funds and not drawn on an incorporated account.

Q It is signed Nancy B. Radcliffe, 3215 North Charles Street, Apartment 206, Baltimore, Maryland, 21218. I would like this to be marked Federal Election Commission Exhibit No. 3.

(Whereupon, the above-mentioned exhibit was marked and received into evidence as Federal Election Commission Exhibit No. 3.)

Q Before I asked you whether or not you signed any

documentation, and you said yes, but you didn't remember the date; does this refresh your memory, this document Commission Exhibit No. 3?

A Yes.

Q When did you sign this document?

A Well, the date is right there. February 20, '80.

Q How come six months after you made the contribution, you signed that paper?

A I don't remember.

Q How often did you see Debra Freeman in September, November, December, approximately? Would you see her twice a week?

A Yes.

Q More times?

A More times.

Q She was the only -- had Ms. Freeman purchased the money order for you?

A Yes.

Q Or she purchased the money order after you gave her the $250 in cash?

A Yes.

Q And she never came to you and said, "I need your signature"?

A Yes, she did, with this.

Q In February?

A Yes.

Q When did you see this Traveler's Express Money Order?

A When I made the contribution.

Q Within a couple of days after?

A This is redundant.

Q Why didn't you sign it at that time?

A You asked me that three times already.

Q And what did you say?

A I said I don't remember why I didn't sign it.

MR. PARKER: The fact is that I don't think a person has to sign money orders, and I think the person who purchases the money order fills in the blanks, as near as I know.

Q Is this your handwriting here, "$250, 9/10/79". For the record, I am referring to Exhibit No. 3 -- whether or not the information before this signature is your handwriting.

A The signature is my handwriting.

Q What about the address?

A Yes.

Q Were you living there at that time?

A Yes.

Q Before, you testified that you had been living

at 308 East 31st Street for the last seven months.

A That is correct.

Q Well, this was done less than seven months ago.

A Well, I counted February, March, April, May, June, July, August. That is how I counted seven months.

Q Yes, but this is March 1st.

MR. PARKER: That is February 29th.

A That is February.

Q Right. It's one day from March. It is really five months ago.

MS. GENTNER: February 28 you stated you counted February as a month that you had been living at that address?

A This address I was still using at that time, because my checking account, my mail, et cetera, was coming to this address. I was residing at 308 East 31st Street since February, mid to late February.

Q Is this your handwriting with the address?

A That's my handwriting.

Q But the number up here, 2/28/80, the $250, and 9/10/79 are not?

A I don't know.

Q You don't recognize it as your handwriting?

A I don't remember.

Q Do you recognize it as your handwriting?

MR. PARKER: She has already said she couldn't.

A I said I don't remember.

Q Do you recognize this as your handwriting?

A Do I recognize this as my handwriting? It could be my handwriting.

Q Do you recognize it as your handwriting?

A I said it could be my handwriting.

Q It is not responsive to my question.

MR. PARKER: She said three or four times she doesn't recognize it as her handwriting. You just said that, "Do you recognize this as your handwriting".

MR. BOGIN: She has not said she doesn't recognize it as her handwriting. You just said that.

Q Do you recognize this as your handwriting?

MR. PARKER: Go back and read the answer to the first question.

(The pending question was read back by the reporter.)

Q You have not yet responded whether or not you recognized 2/28/80, $250, and 9/10/79 on Commission Exhibit No. 3 as your handwriting. Do you recognize that as your handwriting?

A I said I don't know. It could be my handwriting.

Q Who was the person who gave you this Commission Exhibit No. 3 to sign?

A Debbie Freeman.

Q What did she do, call you up and say, "I would like you to sign the document"?

A I don't remember.

Q Tell me the circumstances under which you signed this document.

A I signed them -- I signed the document. What do you mean, the circumstances? She showed it to me, and I signed the document.

Q So you remember her showing you the document?

A Yes.

Q And how did she get in touch with you?

A When I saw her.

Q You have seen this document before today, then?

A Yes.

Q The whole document and not just your name and address?

A Yes.

Q And you remember Ms. Freeman giving you this document to sign?

A Yes.

Q And you signed it?

A Yes.

Q And you put your address down?

A Yes.

Q But you cannot tell me whether or not you put these figures down?

A I don't remember.

Q By these figures, I mean Commission Exhibit No. 3, the figures about the signature.

MS. GENTNER: Why is it you are able to identify your signature, but you are not able to identify these? Why is it that you know that these figures, the zip code, are your figures that you wrote, but you cannot identify whether these numbers are in your handwriting on the same document?

A Well, because this is part of my, you know, my signature as I am going along and writing in the same -- you know -- one right after another.

MR. PARKER: Indicating her name and address.

A Right.

MS. GENTNER: So, you are saying you recognize this as being your handwriting?

A Yes.

MS. GENTNER: Do you recognize this as your handwriting? (indicating)

A I said I don't remember. That is not writing.

MS. GENTNER: Neither is the zip code.

A I don't remember.

Q We are going to go one more time through a scenario, when you solicited or received a contribution. And the reason we are doing that is because you said there were various ways which you did it, and I don't think we fully got the various ways. I would like you to just give us a recitation of one way in which you solicited a contribution.

PENNAC CO. BAYONNE, N.J. 07002 - FORM 740

A I would knock on people's doors, ask them for a contribution.

Q And then somebody would give you a contribution?

A Sometimes.

Q If they gave you a contribution in cash, would you accept it?

A Sometimes, yes.

Q When you got a cash contribution, what did you do with that?

A What did I do with a cash contribution?

Q Uh-huh.

A I turned it in with my other contributions.

Q Turned it in to who?

A To Debra Freeman.

Q Did you ever mail contributions directly to New York?

A Yes.

Q Did you ever send cash to New York?

A No.

Q Did you ever send money orders to New York?

A Yes.

Q Did you ever take cash contributions and convert it into money orders before sending it to New York?

A No.

Q Did you ever take cash converted into money orders

PINNACLE CO., BAYONNE, N.J. 07002 - FORM 740

and give it to Debra Freeman?

A No.

Q Did you ever give cash to Debra Freeman and have her buy a money order with that?

A Yes.

Q How many times?

A As my contribution.

Q Any other times?

A No.

Q You are not aware of other people giving Debra Freeman cash to convert into --

A I don't know.

Q When you received cash, you gave it to Debra Freeman?

A Yes.

Q And what did she do with the cash?

A I don't know.

Q Is Debra Freeman a volunteer worker for the Citizens for LaRouche?

A Yes.

Q Is she in charge of the campaign in Baltimore, or is she one of the people in charge?

A One of the people. There are several.

Q You don't consider yourself one of the people in charge?

A No.

Q So you don't know what Debra Freeman did with the money she received from you?

A No, no.

Q But the usual way you proceeded was to give any contributions you received to Debra Freeman?

A Sometimes.

Q Who else would you give money to?

A New York.

Q You would send it directly?

A Yes.

Q And when you did that -- let's go through that scenario. You would receive cash, you would receive a contribution from somebody. Then, what did you do after that, if you were going to send it to New York? I would like to know the steps.

A I went to the Post Office and sent it to New York.

Q You just took the -- let's say it was a check. You took the check and went from the door to the Post Office?

A No, not from the door to the Post Office.

Q Well, I would like to know what steps you went through.

A I would take the contributions, and you know, combine them with other checks or money orders or whatever, that other people had had, and it would go express mail to

PIGEAD CO. BAYONNE, N.J. 07002 FORM 740

New York, and I would take them express mail to New York.

Q But these contributions didn't all come in the same day that you sent express mail?

A No.

Q Where did you keep them as they were coming in?

A Well, Debra Freeman kept some.

Q So, did you give them to Debra Freeman, the ones that you got and then --

A And then I took them to New York, yes.

Q And where did she keep them, the contributions.

A I don't remember.

Q Was there no central location where you would go to pick up contributions to mail up to New York?

A (Witness moves head from side to side indicating negative response.)

Q Where would Debra Freeman go to -- where would you meet Debra Freeman then, where would you meet to pick up contributions to send to New York?

A Several places.

Q Name them.

A Different people's homes different -- well, the places I named before where we held LaRouche campaign meetings.

Q And she would say, "Nancy, I have some contributions I would like you to send up to New York"?

A Yes.

Q Did you send anything else other than contributions to New York?

A No.

Q Did you ever include in with those contributions any contributor information?

A I don't know.

Q Have you ever seen this form, Commission Exhibit No. 3 in blank or with other people's names or figures on it?

A Yes.

Q Did you ever send that up to New York, documents like Exhibit No. 3?

A I don't remember.

Q Do you remember sending anything other than checks or money orders up to New York?

A I don't remember.

MR. PARKER: Like what? What do you mean?

MR. BOGIN: Any documentation.

A I don't remember.

Q But you remember sending checks and money orders up?

A Uh-huh.

Q You remember sending cash up?

A No.

MS. GENTNER: No, you never sent cash?

PENGAD CO., BAYONNE, N.J. 07002 - FORM 740

A No, I don't remember sending cash.

Q These people's houses that you would meet Debra Freeman, where she would instruct you to send contributions up to New York. Can you remember any of those houses?

A Different campaign volunteers.

Q Name one of those houses.

A Do I have to answer that?

MR. PARKER: The Freemans' house, I assume.

A I will name Debra Freeman's house.

Q So you would go to Debra Freeman's house and she would say, "Hey, I have got some contributions, and I want you to send them to New York"?

A Occasionally.

Q Were they ever already in an envelope?

A Sometimes.

Q What were the other times?

A Sometimes I put them in an envelope.

Q Which you got at Debra Freeman's house?

A I didn't send that many contributions to New York. This was very occasional.

Q How many would you say you sent?

A I don't remember, but it wasn't many. It wasn't a regular occurrence.

Q You were always instructed to send it up; you never did it on your own?

A Right.

residence?

A Linkwood Road, Baltimore.

Q And do you know which address in New York you sent it to?

A It was the Post Office to Post Office.

Q Who was it --

A It was express mail.

Q What was the addressee? Citizens for LaRouche?

A No.

Q It was not Felice Gelman, Citizens for LaRouche?

A I don't remember.

Q You sent out envelopes to New York? Sometimes you actually had to address the envelopes, and you don't remember the address?

A No. I didn't say I addressed the envelope.

Q You said you put them in an envelope and --

A Putting something in an envelope and addressing are two different things.

Q So, you never addressed any envelopes?

A No.

Q And you don't recall whose name was on the envelope you sent out?

A No.

Q But there was a Post Office Box?

A Yes.

Q To New York City?

A It was express mail, Post Office to Post Office to New York City.

Q Express Mail, is that a service --

MR. PARKER: It is a service of the United States Post Office. It goes from one Post Office to the other. Guaranteed delivery, next day.

Q How often would you -- would it be once a month you would bring an envelope to the Post Office?

A I don't remember, probably not that often.

Q Not as often as once a month?

A Right.

MS. GENTNER: You remember that the envelope was addressed to a Post Office Box, and you remember that it was addressed to New York, but you don't remember the name of the person or the entity that it was addressed to?

A No, I don't remember.

Q Did you work for Mr. LaRouche in 1976?

A Yes.

Q Was he running for President then, too?

A Yes.

Q Did you solicit contributions at that time?

MR. PARKER: That is outside the scope of this investigation. I instruct the witness not to answer. It is a waste of time.

Q When did you start working for the 1980 campaign?

A When Mr. LaRouche announced.

Q In early 1979?

A Yes.

Q Do you remember the month?

A I don't remember. It was early.

Q February or March?

A Early.

MR. BOGIN: I have no further questions. I would just like you to let you know there is a confidentiality provision associated with your testifying and under the Act, you are not supposed to discuss this matter. Since the Federal Election Commission wishes to keep this confidential, you should be apprised. You should know there are criminal penalties for talking about these matters that are confidential, which is between the Commission and yourself.

MS. GENTNER: And your attorney.

MR. BOGIN: And your attorney.

MR. PARKER: We have no further questions.

MR. BOGIN: Is it possible to waive signature on this deposition?

MR. PARKER: No, I think Ms. Radcliffe wants to sign this deposition.

MR. BOGIN: All right. Thank you very much.

NANCY D. RADCLIFFE

PLIGAD CO., BAYONNE, N.J. 07002 - FORM 740

(The witness was excused at 11:06 a.m.)

- - - - - -

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, County of Baltimore, do hereby certify that the within is a true and accurate recording of the proceedings indicated.

January 29, 1981

STATE OF MARYLAND

CITY OF BALTIMORE: SS

I, Richmon C. Gore Jr.. a Notary Public in and for the State of Maryland do further certify that Nancy B. Radcliffe was notified by letter dated September 4th. 1980 that her deposition was completed and available in my office for reading and signing by her and that to date she has failed to appear or communicate with me. Having failed to comply with the Maryland Rules allowing thirty days for this purpose I hereby submit the original deposition for filing in this matter.

Richmon C. Gore. Jr.

BIGNAL CO., BAYONNE, N.J. 07002 - FORM 740

GORE BROTHERS REPORTING COMPANY
225 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

13040672983

Federal Election Commission
1325 K St., N.W.
Washington, D. C. 20463
AttN: Mr. Bogin

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF *

MUR 1158

DEBRA HANANIA FREEMAN *

* * * * * * *

Pursuant to notice, the deposition of GEORGE B. P. WARD, JR., was taken on Thursday, June 19, 1980 commencing at 11:10 a.m. at the offices of Maryland National Bank, Suite 2210 Ten Light Street, Baltimore, Maryland 21202, before Phyllis Goldstein, a Notary Public.

APPEARANCES:

Kevin Smith, Esquire
Marsha Gertner, Esquire
On behalf of the Federal Election Commission

Reported by:

Phyllis Goldstein

INDEX

WITNESS:	PAGE:
George B. P. Ward, Jr.	
Examination by Mr. Smith	3

EXHIBITS

Commission Exhibits A, B, C, & D	4
Commission Exhibit E	7

STIPULATION

It is stipulated and agreed between counsel and the witness that the reading and signing of this deposition by the witness be and the same are hereby waived.

* * * * * *

GEORGE B. P. WARD, JR.,

a witness called for examination by the Federal Election Commission, being first duly sworn according to law, testified as follows:

EXAMINATION BY MR. SMITH:

Q Mr. Ward, would you state your full name and business address for the record, please?

A George B. P. Ward, Jr.

Q And your business address?

A Do you mean street address?

Q Here is fine.

A Ten Light Street, Baltimore.

Q By whom are you presently employed?

A Maryland National Bank.

Q What is your position with the Maryland National Bank?

A Vice President.

Q Do part of your duties include responding to subpoenas from administrative agencies?

A Yes.

Q Are we all here today in response to a subpoena that was issued to the Maryland National Bank by the Federal Election Commission?

A Yes.

Q Have you had an opportunity to review that subpoena?

A Yes.

Q Are you going to make available today to us any documents in compliance with that subpoena?

A Yes.

(The reporter marked Commission Exhibits A, B, C and D.)

Q (By Mr. Smith) I am showing you what has been marked Commission Exhibit C. Is that a true and correct copy of the subpoena which you received?

(There was a discussion off the record.)

A Yes.

Q I show you what has been marked Commission Exhibit

D and ask you if that is a true and correct copy of an original which I handed you this morning prior to this deposition entitled Certificate of Compliance With The Right To Financial Privacy Act Of 1978?

A Yes.

Q Have you had a chance to review that document?

A Yes.

Q I show you what has been marked Commission Exhibit A which is entitled Memorandum And Order, and Commission Exhibit B which is entitled Memorandum To Counsel, and ask you if they are true and correct copies of the copies of those documents that I also showed you this morning?

A Yes.

Q Have you had a chance to review those documents?

A Yes.

Q In referring to the subpoena, let me first ask you whether you are making available to us today any bank statements in regard to transactions of Deborah Hanania Freeman?

A Yes.

Q What bank statements do you have with you today?

A With respect to checking account number

in the name of Deborah J. Hanania, we are furnishing statements covering the period January 11, 1979 through April the 9th, 1980.

Q Would you hand those over to me now, please? Thank you.

Let the record reflect that the witness has produced 15 pages of material covered by what appears to be a copy of a signature card for account number . Deborah J. Hanania.

Have you brought with you any other bank statements today?

A Yes. I have statements on savings account number

(There was a discussion off the record.)

Q Go ahead.

A In the name of Deborah J. Hanania for the period January 19, 1979 to March 31, 1980.

(There was a discussion off the record.)

Q Would you hand me those bank statements, please?

(There was a discussion off the record.)

Q By the way, Mr. Ward, was there anything in addi-

tion to the savings account bank statements that you are handing me with that packet of material?

A Yes. I gave you copies of the signature cards for both the checking account and the savings account.

Q Now let the record reflect that the witness has produced what appears to be a copy of both the front and back on two separate sheets of a signature card and three pages appearing to be the transaction history of the savings account number that the witness has testified to.

Am I correct, Mr. Ward, that these two bank statements relate to the only two accounts that you are giving the information from today?

A That's correct.

Q Do you know for a fact that there are no other accounts at the Maryland National Bank which relate to the financial transactions of Deborah Hanania Freeman?

(There was a discussion off the record.)

A I am not sure.

Q Have you engaged at least partially in an effort to -- Strike that.

(A document was marked Commission Exhibit E.)

Q (By Mr. Smith) Mr. Ward, I am going to show you what has been marked Commission Exhibit E which, for the record, appears to be a check drawn on Maryland National Bank account number and ask you if this reflects an account evidencing the financial transactions of Deborah Hanania Freeman?

A This check is not drawn against a checking account. It is what is called a Master Check, and has been charged to a pre-existing credit line under a Master Charge account in the names of Mrs. Hanania and Mr. Freeman.

Q Will you produce today the records associated with that account?

A No. I would point out that state law, that is to say, Section 13-312 of the Commercial Law volume of the Annotated Code of Maryland requires that the bank as the issuer of a credit card give notice to the holder of a subpoena.

(There was a discussion off the record.)

A And we will be required to observe this section of the law.

(There was a discussion off the record.)

Q Let me just state briefly for the record that prior to today we were not aware that the instrument, a copy of which was marked as Exhibit E, related to anything other than an ordinary checking account and were, therefore, unaware of any possible application of any law of the State of Maryland to an administrative agency subpoena directed to records pertaining to such an account.

Therefore, while not necessarily agreeing with the witness's legal interpretation of that law, we will press no further today in an effort to obtain the records from that account.

Let the record further reflect that what has been marked as Commission Exhibit E was obtained from records already on file with the Federal Election Commission. It was not obtained pursuant to any subpoena or otherwise from any other party.

(There was a discussion off the record.)

Q (By Mr. Smith) Mr. Ward, are you able to state with certainty that the bank statements relating to the two accounts that you have already provided, and possibly subject to interpretation, the accounts that you have just testified

to the existence of, are you able to state with certainty that they are the only accounts at the Maryland National Bank that reflect the financial transactions of Deborah Hanania Freeman?

A No.

Q Am I correct that you have not produced for us today any cancelled checks from any of the checking accounts?

A That's correct.

Q Is it my understanding that upon request and with the appropriate reimbursement arrangements, that you will be willing under the coverage of this subpoena to provide us with those which we request in the future?

A To the extent we are able to do so.

Q Would the same be true for deposit slips as --

A Yes.

Q -- for cancelled checks?

Are you able to produce for us today any negotiable instruments that were used to effect withdrawals from either of the accounts for which you have produced statements today?

A Yes.

Q Would you describe the instrument or instruments

that you will be producing?

A I have a copy of a withdrawal slip for the savings account dated January 14, 1980 which indicates a withdrawal of $750, and that as part of that withdrawal, a cashier's check for $250 was issued by the bank.

I have the original of that cashier's check as well as a bank copy of the check which was retained in the branch where the check was issued.

Q Would you produce them for me, please?

Let the record reflect that the witness has produced three sheets of paper, one appearing to be a photocopy of a savings withdrawal ticket on account number in the amount of $750.

Mr. Ward, based on your familiarity with the record-keeping procedures of Maryland National Bank, are you able to tell us from this savings account withdrawal ticket that cashier's check number in the amount of $250 was purchased as a means of withdrawing $250 out of the $750 reflected by this withdrawal slip?

A Yes. That is correct.

(There was a discussion off the record.)

Q In addition to the photocopy of what appears to be a savings withdrawal ticket, the witness has also produced two pieces of paper, one of which appears to be an original cashier's check bearing the number ; the other appearing to be a snap set copy in the nature of a carbon copy of that instrument.

Mr. Ward, let me first ask you whether the number on the cashier's check gives you any information as to the branch at which it was purchased?

A Yes. The number indicates that the check was issued at the North Charles branch office located at 2600, more or less, North Charles Street in Baltimore.

Q Based once again on your familiarity with banking procedures, can you tell us what if any significance the identifying information on the withdrawal ticket has?

(There was a discussion off the record.)

A Looking at this withdrawal slip, I would say that Mrs. Hanania went into a branch where she was not known and was, therefore, asked to produce identification which she did in the form of a Maryland driver's license and a Maryland National BANKCARD, and then was permitted to conduct the trans-

action at a branch other than that at which the account had been established.

Q Looking at the two documents, the original cashier's check and what appears to me to be a snap set copy, I ask you to examine those two documents and point out, if you will, what if any differences exist between the front of the two documents?

A The green snap copy is the bank's carbon which is kept in the branch and, naturally, would reflect what has been typed on the original.

Q Typed by whom, Mr. Ward?

A By the bank's representative at the time the check was issued.

Offhand, looking at the original check, it appears to me that additional language has been placed on the check beside the language which was inserted by the bank.

Q Based on your understanding of the bank's procedures and record-keeping, what if any information did the bank type on the cashier's check to indicate information about the person requesting the issuance of the check, the person purchasing the check, or the person physically receiving the

check?

A The language quote customer request by Deborah Hanania Freeman, end quote appears on the bank's copy as well as on the original check.

Additional language appears on the original check which would appear to be intended to change the content of the statement.

Q In your opinion, based on your understanding of the bank's procedures, what language was typed by the bank?

A Customer request by Deborah Hanania Freeman.

Q What language was not typed by the bank?

A On one line, quote, Dr. Harold Harrison (to be picked up by, unquote, and on the second line, quote, CFL rep.) unquote.

Q In addition to the notation on the savings withdrawal ticket identifying the number of the cashier's check and the amount $250, are there any additional notations on these three documents indicating the source of the funds used for this cashier's check?

A Yes. Written on the bank's copy of the cashier's check are the word savings with slash I

Q And whose account does that refer to?

A That refers to Mrs. Hanania's savings account.

(There was a discussion off the record.)

Q Mr. Ward, do you have any information as to the form in which Mrs. Hanania received the other $500 that was part of this $750 withdrawal?

(There was a discussion off the record.)

A No. My assumption is, however, that since no other cashier's checks are noted on the withdrawal slip, that the balance of the withdrawal was made in cash.

(There was a discussion off the record.)

A To clarify that, the figures 12.56 appearing at the top of the ticket would, under our usual procedure, indicate that some portion of this withdrawal was paid out in cash, and there is some possibility that there may be film which shows Mrs. Hanania at the teller's counter.

Q At the time this transaction was being engaged in?

A Right.

Q Will you make an effort to find whether the bank is in possession of any such film?

A Yes.

Q On that notation, the 12.56, I believe you said 12.56. Might that be a colon?

A Right.

Q What would that indicate to you as the meaning of those figures 1256?

A Twelve fifty-six p.m.

Q Mr. Ward, other than the information and documentation you have given us about this one cashier's check, am I correct that you are not producing for us today any other negotiable instruments either requested, purchased or deposited or used for withdrawals from any of Deborah Hanania's accounts?

A Other than the items which we have discussed here, we are not producing any items.

Q Am I also correct that you cannot say with certainty that no such additional items exist?

A Correct.

Q I am not sure if I remembered to ask you this in the beginning, but are you generally familiar with the record-keeping procedures of the Maryland National Bank?

A Yes.

Q The records you have produced for us today, are they all records kept by Maryland National Bank in the ordinary course of its business?

A Yes, they are.

Q Let me just indicate before we conclude that this deposition is part of a Commission investigation being conducted under the provisions of 2USC Section 437G, and to also indicate that the confidentiality provisions of that section apply to this investigation and to this deposition.

(There was a discussion off the record.)

Q Do you want to read and sign the original of this deposition?

A No.

(The examination was concluded at 12:23 p.m.)

* * * * * * * * * * * * * * * * *

STATE OF MARYLAND

CITY OF BALTIMORE, SS:

I, Phyllis Goldstein, a Notary Public in and for the State of Maryland, Baltimore County, do hereby certify that the within named GEORGE B. P. WARD, JR. personally appeared before me at the time and place herein set out; and

after having been duly sworn by me according to law, was interrogated by counsel.

I further certify that the examination was recorded stenographically by me and then transcribed from my stenographic notes to the within typewritten matter in a true and accurate manner.

I further certify that the stipulation contained herein was entered into by counsel in my presence.

I further certify that I am not of counsel to any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.

As Witness, my Hand and Notarial Seal, this day of June, 1980 at Baltimore, Maryland.

_____

Notary Public

BROTHERS REPORTING COMPANY
221 E. REDWOOD STREET
BALTIMORE, MARYLAND 21202

8304037300

Federal Election Commiss
Office of General Counse
1325 K St., N.W.
Washington, D. C. 20463

Attn: Mr. Kevin Smith

908903

BEFORE THE
FEDERAL ELECTION COMMISSION
MUR 1158

* * *

The deposition of BELINDA FRANCES DeGRAZIA HAIGHT, was taken on Friday, June 4, 1982, commencing at 3:30 o'clock p.m., at the offices of the Federal Election Commission, Federal Building, Baltimore, Maryland, 21201, before Lawrence F. St.Yves, a Notary Public.

* * *

APPEARANCES:

MAYER MORGANROTH, ESQUIRE
On behalf of the Plaintiffs

LAWRENCE M. NOBLE, ESQUIRE
and
MARSHA M. GENTNER, ESQUIRE
and
LOIS LERNER, ESQUIRE
On behalf of the Defendant

REPORTED BY:

Lawrence F. St. Yves

I N D E X

WITNESS	PAGE
Belinda Frances DeGrazia Haight By Ms. Lerner.....	3

DEPOSITION EXHIBITS		PAGE
1	Federal Express money order	18
2	Statement	19

BELINDA FRANCES DeGRAZIA HAIGHT,

called for examination by the Federal Election Commission, being first duly sworn to tell the truth, the whole truth and nothing but the truth, testified as follows:

EXAMINATION BY MS. LERNER:

Q Would you state your full name for the record?

A Belinda Frances DeGrazia Haight.

Q What is your address?

A 105 West 39th Street in Baltimore.

Q And are you employed?

A Self-employed.

Q What type of business do you have or are you in?

A I am a political organizer.

Q How long have you been doing that?

A On and off at various times for about seven years.

Q Are you represented by counsel here today?

A Yes.

Q Who is your counsel? Could you please identify him for the record?

MR. MORGANROTH: Mayer Morganroth.

MS. LERNER: Counsel has identified himself for the record.

There has been a stipulation that Ms. Haight is here pursuant to a subpoena which she received from the Federal Election Commission concerning an investigation into possible violations of the election laws by Citizens for LaRouche and others.

MR. MORGANROTH: She is here pursuant to such a subpoena.

BY MS. LERNER:

Q Ms. Haight, have you discussed your possible testimony here today with anyone else, with anyone other than your attorney?

A No.

Q Do you know a gentleman by the name of Steve Warm?

A Yes.

Q Have you discussed your testimony today with him?

A No.

Q Have you discussed the investigation into possible

election laws by Citizens for LaRouche and others with Mr. Warm?

A No.

Q Yave you discussed it with anyone else?

A Do you mean have I ever talked about the fact that there is an investigation going on, is that what you want to know?

Q Correct.

A Yes.

Q Who have you talked to about that?

A A lot of people. I mean I could name family members. Is that what you mean, who have I talked about the fact that there is an investigation going on or the content of it? I don't understand what you mean.

Q Who have you talked to concerning the contents of the investigation?

A I don't really understand what you're asking.

Q Who have you talked to concerning what the investigation is all about? Has anyone talked to you concerning what the investigation is all about?

A Do you mean do I know what's being investigated?

Q Well, we can start with that one, yes.

A Yes. I apparently know what's being investigated. Apparently there is a violation or the suspicion of violation of election laws or something like that.

Q How did you learn that?

A When I got a subpoena I found out.

Q Okay. Are you familiar with an individual by the name of Lyndon LaRouche?

A Yes.

Q How are you familiar with Mr. LaRouche?

A I've known him since 1974.

Q How do you know him? Did you meet Mr. LaRouche or just know of him?

A Yes I met him.

Q How did you meet him?

A It was at a meeting that I met him in 1974.

Q Are you familiar with an organization called Citizens for LaRouche?

A Yes.

Q How are you familiar with that organization?

A I supported their work to get him elected.

Q When you say supported their work, what time period are we talking about?

A Since they were started.

Q Which was when?

A January of '79.

Q In what way did you support the organization?

A Well, I helped get material around about the campaign and talked to people about it and helped organize it.

Q Would you consider yourself a volunteer for Citizens for LaRouche?

A Yes.

Q This began in January, 1979 and continued through until when?

A Until the election took place, until the election I guess is when the campaign ended.

Q Just for the record what convention are we talking about?

A The democratic convention of 1980.

Q Were you ever paid for any of the duties that you performed for Citizens for LaRouche?

A No.

Q Did you ever work as a fund raiser for them?

A I requested people to make contributions to the campaign if that's what you mean.

Q And while you were working for them where were you working for them physically, what area were you working in?

A Baltimore area.

Q Who did you report to in the Baltimore office of the Citizens for LaRouche?

MR. MORGANROTH: That would presuppose that she reported to anyone.

BY MS. LERNER:

Q Did you report to anyone in the Baltimore office for Citizens for LaRouche?

A There wasn't one person that I just reported to.

Q How was the office structured?

A Well, a lot of us worked together on the campaign

and we met regularly and discussed what we wanted to do.

Q Was there a person or persons who gave instructions to the volunteers as to what duties they would have for that day or for a certain time period?

A Well, there were numbers of people who actually took sort of a leadership responsibility.

Q Who were those people?

A John Ascher, Debbie Freeman, do you want more people?

There were numbers of people who all had different responsibilities for doing different things, so I'm not sure what you really want.

Q Who, if anyone, was primarily responsible for the fund raising activities of Citizens for LaRouche?

A Well, there were a number of people involved in fund raising. The person who handled the money was Debbie Freeman.

Q When you say handled the money, can you explain what you mean?

A Well, when you raised money, that is if someone gave a contribution that's who you gave the money to.

Q And, to your knowledge, what would happen with the contribution once you gave it to Debbie Freeman?

A It was sent -- I think, I mean I'm not sure, but as far as I know it was sent to the headquarters for Citizens for LaRouche.

I mean we raised money for reasons, television and so forth and it was all going to one place.

Q Starting with cash contributions did you ever receive any cash contributions?

A Yes. That's all I ever received.

Q If you received a cash contribution, can you give me a step by step of what happened with a cash contribution from the Baltimore office before it went to New York?

A Do you mean what I did with it?

Q Correct.

A Well, you would make a list of the contributions and give the money and the list to Debbie.

Q Were you ever given any instructions concerning the types of contributions you should accept, the form of the contribution, cash, check or money order?

A No, but I didn't do that much fund raising. Most of the contributions that I got were cash contributions, small contributions. That wasn't the bulk of what I did.

Q Were you ever asked by anyone in the CFL office to purchase a money order?

A I don't remember.

Q If you had been would you remember?

A If I what?

Q If someone had asked you, would you remember?

MR. MORGANROTH: That's totally speculative.

MS. LERNER: Answer the question.

MR. MORGANROTH: I would instruct you not to answer, if you had been, would you remember, then you would have to remember whether you remember which is two steps removed. I instruct you not to remember.

BY MS. LERNER:

Q Are you refusing to answer the question?

A That's what my lawyer says.

Q Are you refusing to answer the question?

A Yes.

Q Have you ever given a contribution to Citizens for LaRouche?

A Yes.

Q In what form? Was it more than one contribution?

A Yes.

Q What form were the contributions that you may have made?

MR. MORGANROTH: If you remember, if you don't say so.

THE WITNESS: I remember at least some of them. I mean I don't remember every contribution, exactly how I gave it.

BY MS. LERNER:

Q Generally how would you give a contribution?

A Sometimes by check, sometimes by cash.

Q Did you ever give any money order contributions?

A Well, I know that all cash that I gave was turned into a money order. I don't remember whether I got it beforehand or afterwards. I don't remember whether it was turned into a money order after I gave it.

Q When you say turned into a money order, I assume you mean a money order was purchased with cash?

A Yes, that's right.

Q Would you purchase the money order or would someone else purchase it?

A I just said that sometimes -- I don't really remember. I know that money orders were gotten. I've gotten money orders for millions of things before and I don't remember whether I got them for the CFL. It's not such a big deal that I have a firm memory of something like that.

Q Do you have knowledge of whether people in CFL were asked to purchase money orders for CFL with cash contributions that were given?

A I don't understand the question.

Q To your knowledge was anyone in the Baltimore office ever asked to go out and purchase a money order with money that had been contributed to CFL in cash for submission to New York?

A In other words, are you asking did anyone ever -- I presume that it happened. I don't remember.

I mean are you asking whether someone asked someone to turn -- someone turned in a donation and someone said get a money order for it, is that what you are saying?

Q Right.

A I don't recall.

Q I'm not asking you to recall a specific instance. I'm asking you to recall whether that was a procedure that occurred there.

A Well, as I said I know that we had to send things up as either checks or money orders. I don't remember how that took place.

Q If someone made a cash contribution and a money order was purchased with that cash, was there -- how would that record be kept of who had given that contribution?

A (No response.)

Q Let me ask that again. You look very puzzled.

You indicated before that you collected cash contributions and you made some sort of a list which you then gave to Debra Freeman.

A Yes.

Q Was there any other record that would evidence that that cash contribution was given?

A I didn't keep the books. I don't know how it was done.

Q Did you know that Citizens for LaRouche was trying to obtain matching funds from the Federal Election Commission?

A Yes.

Q Did you have any understanding concerning what types of funds were required to be submitted in order that they could obtain matching funds?

A No.

Q Were you aware that certain forms of contributions could be matched and other forms could not?

A No.

MS. LERNER: I will ask the reporter to mark this as Commission Exhibit No. 1 for identification, a copy of a Federal Express money order made out to Citizens for LaRouche from Belinda DeGrazia in the amount of $400 dated January 22nd, 1980.

(The Federal Express money order referred to above was marked Commission Exhibit No. 1.)

BY MS. LERNER:

Q I ask you to look at that and tell me whether you have ever seen that money order before.

A I don't recall.

Q Is that your signature on the money order?

A No.

Q Did you purchase that money order?

A No.

Q Did you make a $400 contribution to Citizens for LaRouche on that date?

A Yes.

Q Was that contribution in cash?

A Yes.

MS. LERNER: I ask the reporter to mark this as Commission Exhibit No. 2 for identification. It is a statement dated January 22nd, 1980 which says, I contributed $400 to Citizens for LaRouche on January 22,

1980, signed Belinda F. DeGrazia.

(The statement referred to above was marked Commission Exhibit No. 2.)

BY MS. LERNER:

Q Have you ever seen Commission Exhibit No. 2 before?

A Yes.

Q Is that your signature on it?

A Yes.

Q Did you fill in the rest of the amount?

A Yes.

Q All of it?

A Yes.

Q Including the date at the top that says January 22nd?

A Yes.

Q What were the circumstances of your signing Commission Exhibit No. 2?

A When I gave Debbie the cash I filled out a form.

Q Debbie meaning Debra Freeman?

A Yes.

Q Did she give you the form to fill out?

A Yes.

Q Did she ask you to purchase a money order with that $400?

A No.

Q Did she tell you why she wanted you to sign this Commission Exhibit No. 2?

A For a record, to have a record.

Q A record for what?

A For verification, I mean what else? What are records for?

Q Did you know who the record would be --

A No, I don't know how this stuff works. I didn't know how it worked.

All I know is if I didn't write a check and gave cash they wanted something with my signature on it. That was my understanding of it.

Q But you had no idea why they needed something with your signature on it?

A No, except from the standpoint that if you are going to do anything, I mean you usually have your signature on it if you're going to do something dealing with money and you are dealing with a legal committee or something like that is my understanding of it.

Q Were you given a receipt for your $400?

A No.

Q Were you given --

A Actually I don't remember whether I got a receipt or not. I don't remember.

Q Were you ever asked to go to someone else and have them sign a verification for a contribution that they had made?

A No.

MS. LERNER: Those are all the questions that I have.

MR. MORGANROTH: I have nothing.

MS. LERNER: I would like to move all the exhibits into the deposition transcript.

MR. MORGANROTH: No objection.

MS. LERNER: Ms. Haight, you have the right

to look at this transcript of the deposition and to sign it or you may waive your right to signature. You may want to talk to your attorney about that and also there are certain confidentiality provisions concerning Federal Election enforcement actions which you may want to discuss with him also.

At this time perhaps you would like to talk about the waiver of the signature.

MR. MORGANROTH: I would suggest we waive signature.

THE WITNESS: All right.

MS. LERNER: In addition to that I am now handing the witness a check for $35 which is her witness fee for appearing here today and at this time the deposition will be terminated.

MR. MORGANROTH: No objection.

(Examination concluded.)

REPORTER'S CERTIFICATE

STATE OF MARYLAND

COUNTY OF BALTIMORE:

I hereby certify that on the 4th day of June, 1982 before me personally appeared BELINDA FRANCES DeGRAZIA HAIGHT who was first duly sworn to tell the truth, the whole truth and nothing but the truth;

That the testimony of the said BELINDA FRANCES DeGRAZIA HAIGHT was reduced to writing by me, and the aforegoing is a true record of the testimony given by the said deponent.

I further certify that I am not attorney, relative nor employee of any party hereto, nor otherwise interested in the event of this cause.

In witness whereof I have hereunto affixed my hand and seal this 19th day of July, 1982.

Notary Public (Seal)

LAWYER'S NOTES

Page	Line	

(1000)
Email
6/4/82

FEDERAL EXPRESS MONEY ORDER

119851803 64.79/611

50-008 400.00

PAY THE SUM OF

PAYABLE TO Citizens for LaRouche

NOT VALID OVER $500.00

FROM Belinda F deGrazia

FEDERAL EXPRESS SERVICES CORP.
DRAWER-DRAWEE

ADDRESS 310 Ridgewood Rd

CITY Balto STATE Md ZIP CODE 21210 DATE 1-22-80

⑆061100790⑆ 119851803⑈ 74

(Haight)
Case 2
6/4/82

JANUARY 22, 1980
(date)

I contributed $ 400 to Citizens for Larouche on

January 22, 1980.
(date)

signed

L. I. D. 7 de Haven

DATE _____ DEPOSIT CODE _____

310 Lidgemede Road
(address)

Ro[illegible] Maryland 2[illegible]

maryland national bank
P.O. BOX 987 BALTIMORE, MARYLAND 21203

CASHIER'S CHECK

3441224

JANUARY 11, 1980

PAY TO THE ORDER OF C.F.L. $250.00

14 MARYLAND NATIONAL $250 AND 00 CTS DOLLARS

CUSTOMER REQUEST FY: Dr. Harold Harrison (to be picked up by DEBRA SAMANTA FRIEDMAN, C.F.L. rep.)

Kathleen C. Otzel
AUTHORIZED SIGNATURE

CASHIER'S CHECK (PURCHASER COPY)

---

maryland national bank
P.O. BOX 987 BALTIMORE, MARYLAND 21203

CASHIER'S CHECK

NO 414 3441224

JANUARY 11, 1980

PAY TO THE ORDER OF C.F.L. *$250.00

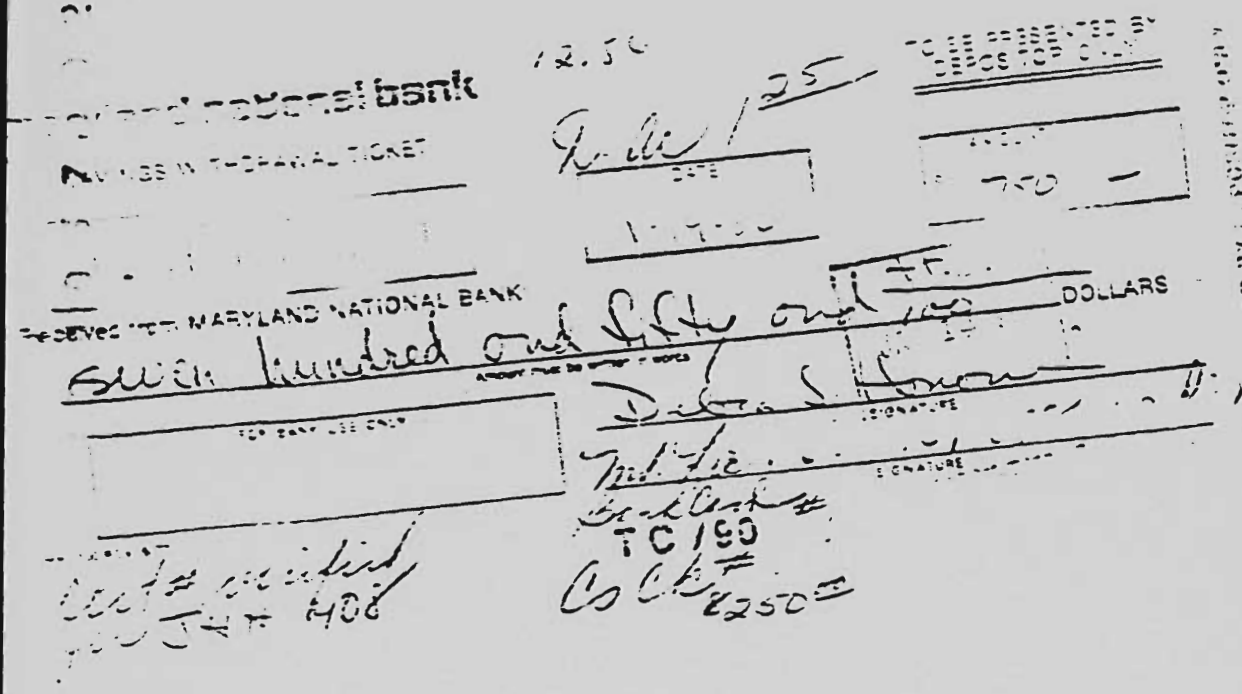
14 MARYLAND NATIONAL $250 AND 00 CTS DOLLARS

CUSTOMER REQUEST FY: Dr. Harold Harrison (to be picked up by DEBRA SAMANTA FRIEDMAN, C.F.L. rep.)

Kathleen C. Otzel
AUTHORIZED SIGNATURE

⑈3441224⑈ ⑆052000168⑆ 002⑈002 4⑈ 91 ⑈0000025000⑈

CASHIER'S CHECK


federal federal bank
PAYABLE IN FEDERAL FUNDS ONLY
12.50
Feb 25
DATE
750 —
RECEIVED FROM MARYLAND NATIONAL BANK
DOLLARS
SIGNATURE
TO BE PRESENTED BY
TC 190
C 0 L 2250

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DEBRA HANANIA FREEMAN	:	
V.	:	CIVIL NO. K-80-839
FEDERAL ELECTION COMMISSION	:	

LAWRENCE K. FREEMAN	:	
V.	:	CIVIL NO. K-80-840
FEDERAL ELECTION COMMISSION	:	

MEMORANDUM AND ORDER

A hearing was held in these cases on the record today. Hal Ponder, Esq., who filed an affidavit in these cases under date of April 29, 1980, gave some additional testimony in the course of the said proceedings in which he stated that he personally was in charge of the investigation by the Commission which is referred to in these cases and that all of the facts presented to this Court in these cases in any document or documents filed on behalf of the Government are true and correct to the best of his own personal knowledge, information, and belief.

Mr. Parker, on behalf of his clients, contended that the Government's actions in seeking the bank records in these cases constitute "harassment" and "intimidation." However, neither Mr. Parker, during his oral argument today, nor plaintiffs or anyone speaking on their behalf in connection with any written filings in these cases has produced a scintilla of evidence to justify any such conclusions. To the contrary, the record would establish that the Government is proceeding on a reasonable basis in seeking the bank records of Mrs. Freeman.

During the proceedings today, Government counsel, Mr. Smith, stated that as of this time, without any prejudice to the right of the Government to seek the individual records of Mr. Freeman at a later date, the Government would not press its quest for

the bank records of Mr. Freeman. However, Mr. Smith stated that the government believed that it was entitled to obtain from the bank all records in connection with any joint account of Mr. and Mrs. Freeman which relate to any transaction which is not identifiable as having been a transaction which involved Mr. Freeman only. Mr. Parker, while maintaining that his clients' motions should be granted on the basis that the Government was involved in "harassment" and "intimidation," stated during the proceedings today that he agreed that if the Government is entitled to receive from the bank all of the records pertaining to Mrs. Freeman's sole bank account, then the Government is also entitled to receive all records pertaining to any joint bank account of Mr. and Mrs. Freeman which records are not clearly identifiable as relating solely to Mr. Freeman.

The motions of plaintiffs are hereby denied for the reasons set forth on the record during the proceeding held earlier today and for the reasons set forth in this Memorandum and Order, except that the bank shall provide to the Commission only those records of any joint bank account of Mr. and Mrs. Freeman to the extent provided in this Memorandum and Order and except that the bank shall not provide to the Commission any of the records pertaining to Mr. Freeman's sole bank account. The bank shall provide all records pertaining to Mrs. Freeman's sole bank account.

The Clerk is directed to send copies of this Memorandum and Order to all counsel of record in these cases.

It is so ORDERED, this 8th day of May, 1980.

United States District Judge

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MARYLAND
BALTIMORE, MARYLAND 21202

FRANK A. KAUFMAN
UNITED STATES DISTRICT JUDGE

May 8, 1980

MEMORANDUM TO COUNSEL RE FREEMAN V. FEDERAL ELECTION COMMISSION AND FREEMAN V. FEDERAL ELECTION COMMISSION - CIVIL NOS. K-80-839 AND K-80-840

After we concluded on the record today in these cases and after counsel and the parties had come into the courtroom in connection with the jury trial scheduled to follow the proceedings held in these cases, government counsel informed me that under the confidentiality procedures involved in matters of this kind, and also in terms of their own proposed schedules, they would not be going to the bank with customers' counsel today or any other day. Government counsel stated that they would be prepared to operate within the bank's interpretation of this Court's Memorandum and Order without reference to the factual and other possible difficulties which may relate to the actual origin of the joint account to which Mr. Smith referred near the end of today's proceedings, and that if any difficulty should arise in that connection in the future, government counsel would present the matter to this Court either in a new proceeding or in a petition to reopen the present proceeding. All counsel indicated their agreement with that approach though Mr. Parker and Mr. Pollard so did without waiving in any way their primary position which rests upon alleged "harassment" and/or "intimidation." You will recall that I dictated this memorandum in your presence at the bench, off the record, after the conclusion of these proceedings today and that counsel on both sides stated their agreement with what is set forth in this memorandum.

Very truly yours,

Frank A. Kaufman

cc: Court Files

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA

TO: George B. P. Ward, Jr., Esquire
Vice President
Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3), to appear in Room 2210, 10 Light Street, Baltimore, Maryland, at 10:30 A.M. on April 17, 1980, and to give testimony under oath in connection with a lawful investigation being undertaken by the Commission pursuant to 2 U.S.C. § 437g(a)(2) which investigation concerns a matter designated as MUR 1158.

You are further ordered to bring with you and produce for inspection and photocopying the following:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and of Lawrence K. Freeman, from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Any questions concerning this subpoena should be directed to Kevin H. Smith (202-523-4529), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 27th day of March, 1980.

Robert O. Tiernan

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

CERTIFICATE OF COMPLIANCE WITH THE RIGHT
TO FINANCIAL PRIVACY ACT OF 1978

To: Maryland National Bank
Post Office Box 987
Baltimore, Maryland 21203

From: Federal Election Commission

I hereby certify that the applicable provisions of the Right to Financial Privacy Act of 1978, 12 U.S.C. §§ 3401-3422, have been complied with as to the attached Subpoena Duces Tecum for the following financial records of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, except for those records specifically identified as pertaining to transactions of Lawrence K. Freeman:

> All documents or records of any kind evidencing the financial transactions of Debra Hanania Freeman, aka Dr. Debra J. Hanania, aka Debra Hanania, and Lawrence K. Freeman from January 1, 1979, to the present, including but not limited to bank statements, cancelled checks, deposit slips, withdrawal slips, negotiable instruments requested or purchased, copies of instruments deposited, and instruments used for withdrawals.

Specifically, these records are being sought through the procedure provided in 12 U.S.C. § 3405.

Pursuant to the Right to Financial Privacy Act of 1978, good faith reliance upon this certificate relieves your institutuion and its emloyees and agents of any possible liability to the customer in connection with the disclosure of these financial records.

Date

Charles N. Steele
General Counsel
Federal Election Commission

Commission Exhibit E

DEBRA J. HANANIA
LAWRENCE K. FREEMAN

NO. 999

7-16
520

4 Dec 19 77

Pay to the order of Citizens for Jackson $ 40.00

forty and 00/100 Dollars

maryland national bank
BALTIMORE, MARYLAND

Memo

Debra J. Hanania

⑆052000168⑆ 9 760 1001 3 8⑈ 1.7

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1158 Depositions

Date Filmed 1-7-83 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1158.

83040383079

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Debra Freeman)

MUR 1158

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 7, 1983, the Commission decided by a vote of 5-0 to take no further action against Debra Freeman.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

2/7/83
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

8304083039

Received in Office of Commission Secretary: 2-2-83, 4:22
Circulated on 48 hour tally basis: 2-3-83, 11:00

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 FEB 2 P4: 22

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 2, 1983

MEMORANDUM

SENSITIVE

TO: The Commission

FROM: Charles N. Steele
General Counsel

RE: Debra Freeman - MUR 1158

On January 18, 1983, the Commission authorized the filing of a civil action for relief against Debra Freeman for failure to comply with the $2,500 civil penalty provision contained in the conciliation agreement she entered into in MUR 1158.

On January 26, 1983, the Commission received payment of Ms. Freeman's civil penalty in the form of a $2,500 cashiers check submitted on her behalf by the National Democratic Policy Committee.*/

As Ms. Freeman is no longer in violation of the civil penalty provision of the conciliation agreement, the Office of General Counsel recommends that the Commission take no further action against Ms. Freeman.

RECOMMENDATION

1) Take no further action against Debra Freeman.

---

*/ On January 18, 1983, after the Commission had already authorized filing suit against Ms. Freeman, a $2,500 check dated January 17, 1983 and drawn on the account of the National Democratic Policy Committee was submitted as payment of Debra Freeman's civil penalty. Upon inquiry the bank on which the check was drawn informed the Office of General Counsel that the account contained insufficient funds to cover the check. Discussions with Ms. Freeman's counsel concerning the matter resulted in the submission of the $2,500 cashier's check.

8304083081

February 2, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1158

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis as a sensitive matter. Thank you.

Attachment

cc: Lerner

3304083037

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1983

Barbara M. Boyd, Treasurer
National Democratic Policy Committee
P.O. Box 26
Midtown Station
233 West 38th Street
New York, NY 10018

Re: Debra Freeman - MUR 1158

Dear Ms. Boyd:

This is to inform you that cashiers check number 3445344, sent to the Commission by your organization as payment of Debra Freeman's $2,500 civil penalty, was forwarded to the Treasurer of the United States on January 27, 1983.

Pursuant to our agreement with Ms. Freeman's attorney, Mr. Morganroth, we are returning National Democratic Policy Comittee check number 1064 to you.

Sincerely,

Charles N. Steele

By: Kenneth A. Gross
Associate General Counsel

Enclosure

cc: Mayer Morganroth

⑆ 3 0 4 0 3 8 3 0 8 ⑆

NATIONAL DEMOCRATIC POLICY COMMITTEE
P.O. BOX 26 MIDTOWN STATION
233 WEST 38TH STREET
NEW YORK, N.Y. 10018

1064

1-12/210

JANUARY 11 1983

PAY TO THE ORDER OF Treasurer of the United States. $ 2500.00

Two Thousand Five Hundred and 00/100THS DOLLARS

CHEMICAL BANK
9th Ave. AVENUE
NEW YORK, N.Y. 10011

FOR FEC : DEBRA H. FREEMAN

Burleigh M. Boyd

203676 9412 RECEIVED AT THE FEC
83 JAN 26 P 4:31

National Democratic Policy Committee
Post Office Box 26 • Midtown Sta. 233 W. 38th St. • New York, N.Y. 10018 • (212) 927-4444
711 S. Vermont Ave., #207, Los Angeles, CA 90005 383-2912
1824 Noriega Street, San Francisco, CA 94122 661-7663

January 25, 1983

Federal Elections Commission
1325 K Street NW
Washington, D. C. 20463

ATTENTION: Lois Lerner, Esq.
Marsha Gentner, Esq.

RE: MUR 1158, Debra Freeman

Dear Ms. Lerner and Ms. Gentner:

Enclosed please find cashiers check #3445344 from the account of the National Democratic Policy Committee in the amount of two thousand five hundred dollars ($2,500.00), payable to the Treasurer of the United States. This payment is a replacement for National Democratic Policy Committee check # 1064 for the fine in MUR 1158 against Debra H. Freeman. It is my understanding that you will foreward this cashiers check to the Treasurer of the United States and return our check #1064 to our New York City office. Please notify Barbara M. Boyd, Treasurer, that the check has so been forewarded.

Very truly yours,

Khushro Ghandhi

KG:da
cc: Barbara M. Boyd

83040385085

8304038309 6

First Interstate Bank

First Interstate Bank
of California
Wilshire-Catalina Office
3348 Wilshire Blvd.
Los Angeles, CA 90010

№ 3445334

Cashiers Check

16-21/108
1220

DATE January 25, 1983

PAY . First Interstate 2,500dol's00cts $***2,500.00***

TO THE ORDER OF ***United States Treasurer***

M. Errico
AUTHORIZED SIGNATURE 24968

⑈03445334⑈ ⑆122000218⑆1080⑈98950⑈ 11

NATIONAL DEMOCRATIC POLICY COMMITTEE
711 SOUTH VERMONT AVENUE, SUITE 207
LOS ANGELES, CALIFORNIA 90006

Federal Elections Commission
1325 K Street NW
Washington, D. C. 20463

ATTN: Lois Lerner & Marsha Gentner

30440330137

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche Conciliation Agreement

Dear Mr. Morganroth:

8304038

On October 25, 1982 you entered into a conciliation agreement on behalf of Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its $5,000 initial installment payment of that penalty on December 1, 1982, followed by ten consecutive monthly installments of $1,000 to begin January 1, 1983. The agreement further provides that if any installment payment is not received at the Commission by the fifth day of the month in which it becomes due, the Commission may accelerate the remaining payments - causing the entire amount to become due ten days after CFL receives written notice of such an acceleration.

On December 9, 1982, the Commission notified you that it had not received CFL's initial $5,000 installment and advised you that CFL should forward the $5,000 payment prior to December 17, 1982, in order to avoid acceleration of the entire amount. No such payment has been received. In addition, the first $1,000 monthly installment payment due on January 1, 1983 is now overdue.

On January 18, 1983, based on CFL's failure to comply with the payment schedule set forth in the conciliation agreement, the Commission authorized the acceleration of all remaining payments. Please be advised, therefore, that the entire civil penalty ($15,000) is due ten days after your receipt of this letter. Additionally, the Commission has authorized the filing of a civil

action for relief against both CFL and Lyndon LaRouche*/ in the event that payment of the entire $15,000 is not received within 10 days of your receipt of this notice.

If you have any questions concerning the Commission's actions, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

cc: Edward Spannaus

8304038089

---

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Mr. LaRouche agreed to pay any civil penalties assessed against CFL pursuant to a conciliation agreement.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its $5,000 initial installment payment of that penalty on December 1, 1982, followed by ten consecutive monthly installments of $1,000 to begin January 1, 1983. The agreement further provides that if any installment payment is not received at the Commission by the fifth day of the month in which it becomes due, the Commission may accelerate the remaining payments - causing the entire amount to become due ten days after CFL receives written notice of such an acceleration.

On December 9, 1982, the Commission notified you that it had not received CFL's initial $5,000 installment and advised you that CFL should forward the $5,000 payment prior to December 17, 1982, in order to avoid acceleration of the entire amount. No such payment has been received. In addition, the first $1,000 monthly installment payment due on January 1, 1983 is now overdue.

On January , 1983, based on CFL's failure to comply with the payment schedule set forth in the conciliation agreement, the Commission authorized the acceleration of all remaining payments. Please be advised, therefore, that the entire civil penalty ($15,000) is due ten days after your receipt of this letter. Additionally, the Commission has authorized the filing of a civil

action for relief against both CFL and Lyndon LaRouche*/ in the event that payment of the entire $15,000 is not received within 10 days of your receipt of this notice.

If you have any questions concerning the Commission's actions, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

cc: Edward Spannaus

8304036830911

---

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Mr. LaRouche agreed to pay any civil penalties assessed against CFL pursuant to a conciliation agreement.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The File

FROM: Lois G. Lerner
Attorney

RE: Debra Freeman Conciliation Agreement - MUR 1158
and CFL Conciliation Agreement - MURs 1158, 1183 1253
and 1352

Date: January 19, 1983

6304033092

On January 18, 1983, the Commission received a $2,500 check dated January 17, 1983, as payment of Debra H. Freeman's civil penalty. On January 19, 1983 I called the Chemical Bank in New York to find out if there were enough funds in the account to cover the check. I was told by the Clearance Department that there were insufficient funds in the account to cover the $2,500 check.

I then called Mr. Morganroth, counsel for Ms. Freeman, and told him what had happened and suggested a certified check be sent in place of the one already received. He then called Barbara Boyd and she told him she would send a certified check for $2,500 to replace the first check. I told Mr. Morganroth I would return the first check to him upon receipt of the certified check.

I also told Mr. Morganroth that the Commission had authorized acceleration of all of CFl's civil penalty payments and, in the event the entire penalty is not paid within ten days of CFL's receipt of notice of the acceleration, had also authorized filing a civil suit against CFL and Lyndon LaRouche. I asked Mr. Morganroth, as attorney for Mr. LaRouche, whether it was sufficient to send him notice of the Commission's actions concerning Mr. LaRouche or whether I should send notice to Mr. LaRouche directly. He told me to send him the notice, but to also send a copy to the following address, attention Edward Spannaus:

NCLC
304 W. 58th Street
New York, NY 10019

203810

RECEIVED AT THE FEC

83 JAN 18 P 4:17

National Democratic Policy Committee

Lyndon H. LaRouche, Jr.
Chairman
Executive Council
Warren Hamerman
Vice Chairman
Barbara Boyd
Treasurer

GCC #9264

Post Office Box 26 • Midtown Station, 233 W. 38th Street • New York, New York 10018 • (212) 927-4444

January 17, 1983

Federal Election Commission
1325 K Street NW
Washington, D.C. 20463
Att: Lois Lerner, Esq. and Marsha Gentner, Esq.
Re: MUR 1158, Debra Freeman

Dear Ms. Lerner and Ms. Gentner:

Enclosed please find National Democratic Policy Committee check 1064 in the amount of $2,500.00 payable to the Treasurer of the United States. This check is in payment of the fine in MUR 1158 against Debra H. Freeman. It is my understanding that you will forward this check to the Treasurer of the United States. Please notify the undersigned in writing that the check has been so forwarded.

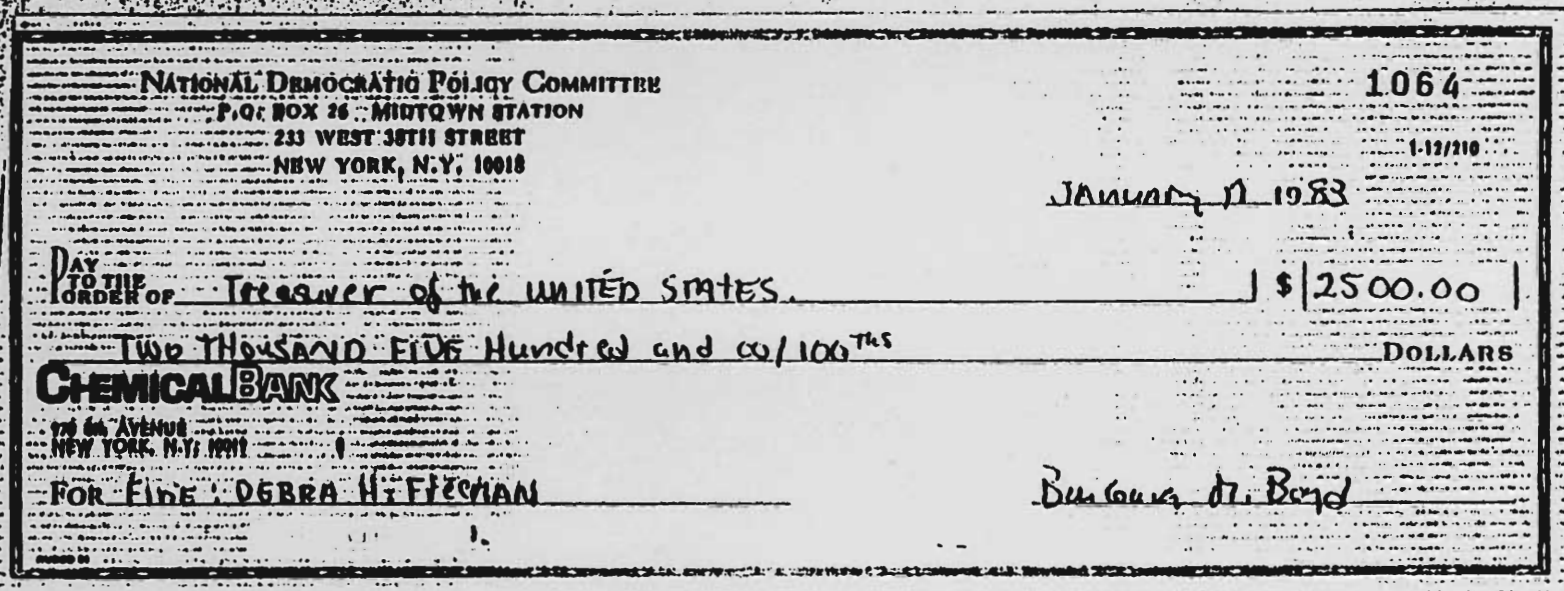
Very truly yours,

Barbara M. Boyd

Barbara M. Boyd,
Treasurer

cc: Mayer Morganroth, Esq.

8304030930



NATIONAL DEMOCRATIC POLICY COMMITTEE
P.O. BOX 26 - MIDTOWN STATION
233 WEST 38TH STREET
NEW YORK, N.Y. 10018

1064

1-12/210

JANUARY 11 1983

PAY TO THE ORDER OF Treasurer of the UNITED STATES. $ 2500.00

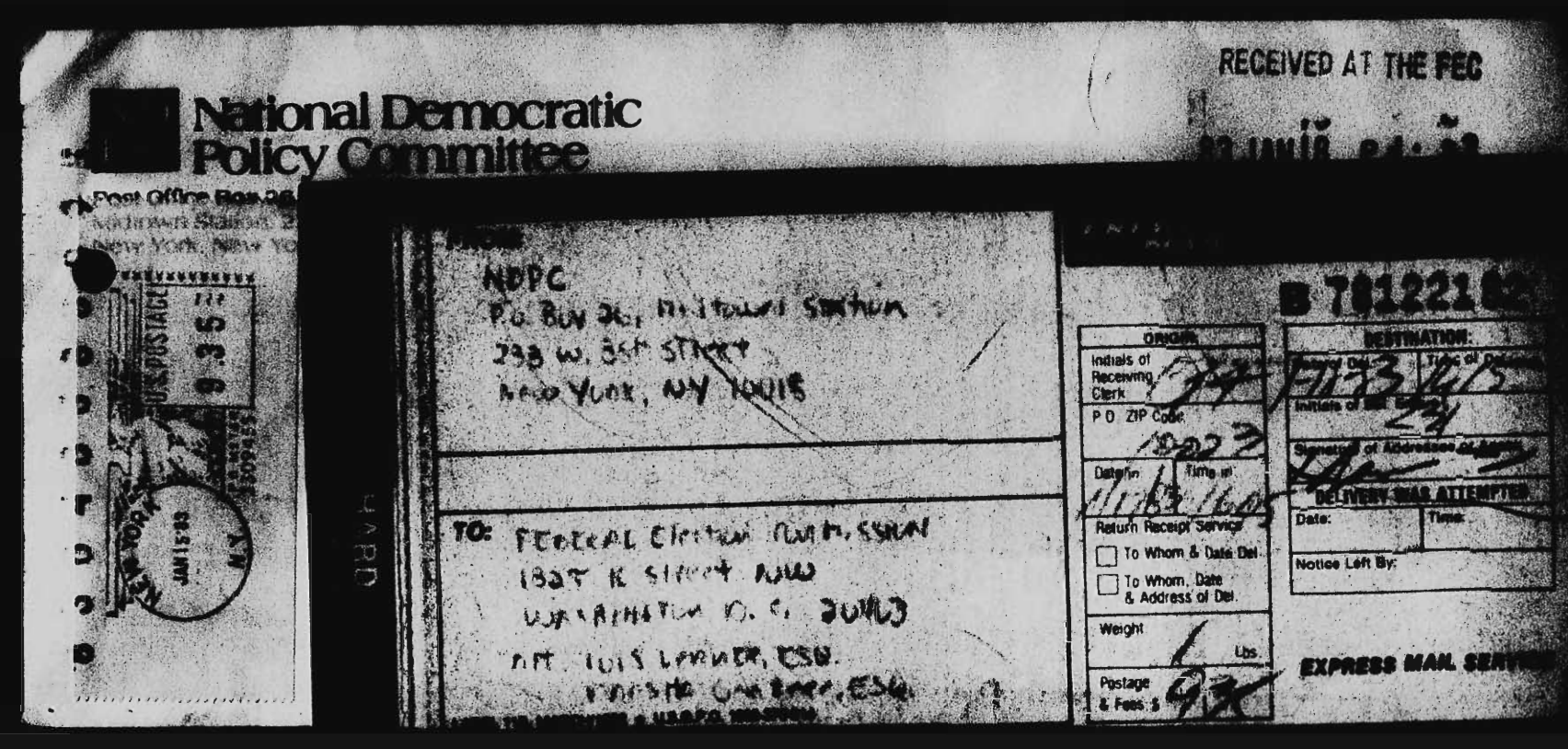
TWO THOUSAND FIVE Hundred and 00/100THS DOLLARS

CHEMICAL BANK
270 6th AVENUE
NEW YORK, N.Y. 10013

FOR FIVE : DEBRA HEFFERNAN

Barbara M. Boyd

⑆021200182⑆ 8 3 0 4 0 ⑈ 0 0 2 5 0 0



National Democratic Policy Committee

RECEIVED AT THE FEC

Post Office Box 20

NDPC
P.O. Box 20, Midtown Station
238 W. 35th Street
New York, NY 10018

TO: Federal Election Commission
1825 K Street NW
Washington D.C. 20463
Att. Lois Lerner, ESQ.
Thomasina Rowe, ESQ.

ORIGIN
Initials of Receiving Clerk
P O ZIP Code 10223
Date In
Time In
Return Receipt Service
To Whom & Date Del.
To Whom, Date & Address of Del.
Weight Lbs.
Postage & Fees $ 9.35

DESTINATION
Initials of
DELIVERY WAS ATTEMPTED
Date:
Time:
Notice Left By:

EXPRESS MAIL SERVICE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Debra H. Freeman)

MUR 1158

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on January 18, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Authorize the filing of a civil action against Debra H. Freeman;

2. Approve the letter attached to the General Counsel's January 6, 1983 report, which would notify Ms. Freeman's counsel of the Commission's action.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

Jan 18, 1983
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

8304030960

January 6, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1158

Please have the attached Memo to the Commission distributed to the Commission for the agenda of January 18, 1983.as a sensitive matter. Thank you.

Attachment

cc: Lerner

8304018307

EXECUTIVE SESSION

JAN 18 1983

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

83 JAN 6 P1:26

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

January 6, 1983

MEMORANDUM

SENSITIVE

TO: The Commission

FROM: Charles N. Steele
General Counsel

RE: Debra H. Freeman Conciliation Agreement - MUR 1158

On November 5, 1982, the Commission accepted a conciliation agreement submitted on behalf of Debra H. Freeman in MUR 1158. Under the terms of the conciliation agreement Ms. Freeman was required to pay a $2,500 civil penalty within thirty days of the Commission's acceptance of the agreement. (See Attachment I)

As of December 15, 1982, forty days after the agreement was accepted, no payment from Ms. Freeman had been received. Consequently, the Office of General Counsel sent Ms. Freeman's attorney a letter advising him of her delinquency. (See Attachment II) The letter also pointed out that Ms. Freeman's failure to comply with the conciliation agreement could result in the Commission filing a civil suit against her in the district court, and suggested that such action could be avoided if Ms. Freeman forwarded a check for $2,500 prior to December 24, 1982.

The Commission has not yet received a check or any other response from Ms. Freeman or her attorney. The Office of General Counsel, therefore, recommends that the Commission authorize the institution of a civil action for relief in the United States District Court for the District of Columbia and notify counsel for Ms. Freeman of the authorization. (See Attachment III)

Recommendation

1) Authorize the filing of a civil action against Debra H. Freeman;

8304036

2) Approve the attached letter notifying Ms. Freeman's counsel of the Commission's action.

Attachments

I. Signed conciliation agreement of Debra H. Freeman

II. December 15, 1982 letter to Mayer Morganroth, Ms. Freeman's counsel.

III. Proposed letter to Ms. Freeman's counsel notifying him of the Commission's authorization to file suit against his client.

8304038309?

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Debra Hanania Freeman) MUR 1158

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

8 3 0 4 0 6 8 3 1 0 6

1. Respondent was a volunteer agent for the Citizens for LaRouche Campaign Committee during the 1980 presidential primary campaign.

2. As such, Respondent solicited and collected campaign contributions in and around Baltimore, Maryland for the Citizens for LaRouche committee and forwarded them to LaRouche headquarters in New York.

3. Respondent was aware that the contributions which were forwarded to New York would be submitted by Citizens for LaRouche to the Federal Election Commission in an effort to obtain presidential primary matching funds.

4. On or about January 14, 1980 respondent withdrew $750 from her personal savings account at the Maryland National Bank and used part of that withdrawal to purchase cashier's check No. 3441224 in the amount of $250.

5. Cashier's check No. 3441224, along with a contribution acknowledgement document purportedly signed by Harold H. Harrison, M.D., was forwarded to the New York headquarters of Citizens for LaRouche and subsequently submitted to the Federal Election Commission for the purpose of receiving matching funds.

V. The above facts reveal that Respondent committed the following violations:

1. 2 U.S.C. § 441f by making a contribution to Citizens for LaRouche in the name of another, to wit, Harold H. Harrison, M.D.

8304083101

2. 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully furnishing false information which misrepresented a material fact, to wit, Maryland National Bank cashier's check No. 3441224 in the amount of $250, to the Commission in an effort to obtain presidential primary matching funds for Citizens for LaRouche.

VI. The Commission has treated the matters described in this document as civil violations.

VII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two thousand five hundred dollars ($2,500) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that she shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

8304083103

X. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action with regard to the matters set forth in this agreement or in MUR 1158 as it pertains to this respondent.

XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

Nov. 5, 1982
Date

By: Kenneth A. Gross
Associate General Counsel

Debra Hanania Freeman

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

ATTACHMENT I (4 of 4)

8304038310

021027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1158 - Debra H. Freeman
Conciliation Agreement

Dear Mr. Morganroth:

On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of your client, Debra H. Freeman. Under its terms, Ms. Freeman is required to pay a civil penalty of $2,500 within thirty days of the Commission's acceptance of the conciliation agreement.

It is now December 15, forty days since the agreement was accepted, and the Commission still has not received Ms. Freeman's payment. I, therefore, direct your attention to paragraph IX of the conciliation agreement which states in pertinent part:

> If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

In order to avoid the filing of such an action, Ms. Freeman should forward a check in the amount of $2,500 to the Commission prior to December 24, 1982.

This is the only notice of deliquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT II (1 of 1)

8304058310 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Debra H. Freeman Conciliation Agreement

8304038310

Dear Mr. Morganroth:

On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of your client, Debra H. Freeman. Under its terms, Ms. Freeman was required to pay a civil penalty of $2,500 within thirty days of the Commission's acceptance of the conciliation agreement.

As of December 15, 1982, forty days after the Commission accepted the conciliation agreement, Ms. Freeman had not paid the penalty. Consequently, the Commission notified you of Ms. Freeman's delinquency and advised you that she should forward the $2,500 payment prior to December 24, 1982, in order to avoid further Commission action. No such payment has been received.

On January , 1983, as a result of Ms. Freeman's failure to comply with the conciliation agreement, the Commission authorized the institution of a civil action for relief in the United States District Court for the District of Columbia.

If you have any questions concerning the Commission's action, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

ATTACHMENT III (1 of 1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1158 - Debra H. Freeman
Conciliation Agreement

Dear Mr. Morganroth:

On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of your client, Debra H. Freeman. Under its terms, Ms. Freeman is required to pay a civil penalty of $2,500 within thirty days of the Commission's acceptance of the conciliation agreement.

It is now December 15, forty days since the agreement was accepted, and the Comission still has not received Ms. Freeman's payment. I, therefore, direct your attention to paragraph IX of the conciliation agreement which states in pertinent part:

> If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

In order to avoid the filing of such an action, Ms. Freeman should forward a check in the amount of $2,500 to the Commission prior to December 24, 1982.

This is the only notice of deliquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304058310.6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 9, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche
Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of your client, Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its initial installment payment of that penalty, in the amount of $5,000, on December 1, 1982.

It is now December 9, and no such payment has been received by the Commission. I, therefore, direct your attention to paragraph IV, section 4 of the conciliation agreement which states:

> In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to respondent.

In order to avoid such an accelaration, CFL should forward a check to the Commission in the full amount due ($5,000) prior to December 17, 1982.

This is the only notice of deliquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304010107
12/9/82

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 1158.

8304058308

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

33040400077

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 1158.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 1158, 1186, 1253 and 1352
Citizens for LaRouche)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on January 18, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Authorize the acceleration of all CFL installment payments, thereby making the full amount ($15,000) due ten days after written notice is received by CFL;

2. Authorize the filing of a civil action for relief against CFL and Lyndon LaRouche if full payment of the $15,000 civil penalty is not received by February 1, 1983; and

3. Approve the letter notifying counsel for CFL of the Commission's actions as recommended by the FEC General Counsel in the report dated January 6, 1983.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

Jan 18, 1983
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

8304000078

January 6, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MURs 1158, 1186, 1253 and 1352

Please have the attached Memo to the Commission distributed to the Commission for the agenda of January 18, 1983 as a sensitive matter. Thank you.

Attachment

cc: Lerner

8304040087

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 6 P1:26

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 6, 1983

EXECUTIVE SESSION

MEMORANDUM

JAN 18 1983

SENSITIVE

TO: The Commission

FROM: Charles N. Steele
General Counsel

RE: Citizens for LaRouche Conciliation Agreement - MURs 1158, 1186, 1253 and 1352

On November 5, 1982, the Commission accepted a conciliation agreement submitted on behalf of Citizens for LaRouche (CFL) in MURs 1158, 1186, 1253 and 1352, in which CFL agreed to pay a $15,000 civil penalty to the Commission. (See Attachment I) According to the terms of that agreement CFL was to make an initial installment payment of $5,000 on December 1, 1982, followed by ten consecutive monthly installments of $1,000 each. The agreement further provides that if any of the installment payments is not made on time, the Commission may accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to CFL.

As of December 15, 1982, the Commission had not received CFL's initial installment payment of $5,000. Consequently, the Office of General Counsel sent a letter to CFL's counsel notifying him of the delinquency and reminding him of the acceleration provision in the conciliation agreement. (See Attachment II) The letter also advised that CFL should forward a $5,000 check to the Commission prior to December 17, 1982 if it wished to avoid further Commission consideration of the matter.

The Commission has not yet received a check or any other response from CFL or its attorney. The Office of General Counsel, therefore, recommends that the Commission authorize the acceleration of all the CFL installment payments, authorize the filing of a civil action for relief against both CFL and Lyndon

8304000036

LaRouche*/ in the event full payment of the accelerated amount is not received within 10 days of CFL's receipt of the Commission's notice, and approve the attached letter notifying CFL's counsel of those actions. (See Attachment IV)

Recommendation

1) Authorize the acceleration of all CFL installment payments, thereby, making the full amount ($15,000) due ten days after written notice is received by CFL.

2) Authorize the filing of a civil action for relief against CFL and Lyndon LaRouche if full payment of the $15,000 civil penalty is not received by February 1, 1983.

3) Approve attached letter notifying counsel for CFL of the Commission's actions.

Attachments

I. Signed conciliation agreement of CFL;

II. December 9, 1982 letter to Mayer Morganroth, counsel for CFL;

III. Candidate certification letter submitted by Lyndon LaRouche.

IV. Proposed letter notifying CFL's counsel of the Commission's actions.

8304100031

---

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Lyndon LaRouche certified that he had read Section 9033.1 of the Commission's regulations and agreed to comply with each condition set forth, therein. (See Attachment III) Section 9033.1(9) states:

> The candidate shall pay any civil penalties included in a conciliation agreement with or imposed under 2 U.S.C. § 437g against the candidate, the principal campaign committee or any authorized committee of the candidate. (emphasis added)

As Mr. LaRouche certified that he would pay any CFL civil penalty the suit should be filed against both he and CFL.

LaRouche*/ in the event full payment of the accelerated amount is not received within 10 days of CFL's receipt of the Commission's notice, and approve the attached letter notifying CFL's counsel of those actions. (See Attachment IV)

Recommendation

1) Authorize the acceleration of all CFL installment payments, thereby, making the full amount ($15,000) due ten days after written notice is received by CFL.

2) Authorize the filing of a civil action for relief against CFL and Lyndon LaRouche if full payment of the $15,000 civil penalty is not received by February 1, 1983.

3) Approve attached letter notifying counsel for CFL of the Commission's actions.

Attachments

I. Signed conciliation agreement of CFL;

II. December 9, 1982 letter to Mayer Morganroth, counsel for CFL;

III. Candidate certification letter submitted by Lyndon LaRouche.

IV. Proposed letter notifying CFL's counsel of the Commission's actions.

8304100031

---

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Lyndon LaRouche certified that he had read Section 9033.1 of the Commission's regulations and agreed to comply with each condition set forth, therein. (See Attachment III) Section 9033.1(9) states:

> The candidate shall pay any civil penalties included in a conciliation agreement with or imposed under 2 U.S.C. § 437g against the candidate, the principal campaign committee or any authorized committee of the candidate. (emphasis added)

As Mr. LaRouche certified that he would pay any CFL civil penalty the suit should be filed against both he and CFL.

92 OCT 27 P12:25

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for LaRouche) MURs 1158, 1186, 1253 and 1352
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to information obtained in the normal course of carrying out the Commission's supervisory responsibilities under the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., and the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9031 et seq. Reason to believe has been found that the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. § 441f;

11 C.F.R. § 110.4(c)(2);

2 U.S.C. § 441a(f) and;

26 U.S.C. § 9042(c)(1)(A).

NOW, THEREFORE, the Commission and Respondent, having entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. The Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is the principal campaign committee authorized by Lyndon LaRouche to receive contributions and make expenditures in connection with Lyndon LaRouche's candidacy for the Democratic nomination for the office of President in 1980.

2. During that period, Respondent maintained offices throughout the country where volunteers, inter alia, solicited contributions and forwarded them to Respondent's New York headquarters.

3. These volunteers knew that Respondent would submit the collected contributions to the Commission in an effort to obtain presidential primary matching funds.

4. Respondent, through its volunteers, violated 2 U.S.C. § 441f by knowingly accepting the following contributions made by one person in the name of another:

(A) MUR 1158

(1) $250 cashier's check in the name of Harold Harrison dated 1/14/80.

(2) $150 money order in the name of Anne R. Taylor dated 11/20/79.

(3) $1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

(1) $250 money order signed "Robert Hart" and dated 12/10/79 (no accompanying signature document).

(2) $125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(3) $120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).

(4) $100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).

(5) $100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).

(6) $135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(7) $85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(8) $80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).

(9) $55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

5. Respondent, through its volunteers, violated 11 C.F.R. § 110.4(c)(2) by accepting and retaining the following cash contributions, which when added to the contributors' previous contributions, exceeded, in the aggregate, $100 in cash for each of the respective contributors:

(A) MUR 1158

(1) $40 cash contribution made by Ernest Pulsifer.

(2) $150 cash contribution made by Ernest Pulsifer.

(3) $250 cash contribution made by Nancy Radcliffe.

(4) $400 cash contribution made by Belinda F. deGrazia.

8304100033

The Commission has not alleged that these were knowing and willful violations.

6. Respondent, through its volunteers, violated 2 U.S.C. § 441a(f) by knowingly accepting the following contributions which were in violation of contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(A):

(A) MUR 1158

(1) $1,009.58 check from David Sanders.

(B) MUR 1253

(1) $2,713.53 in contributions from Rochelle Ascher;

(2) $1,742.15 in contributions from Karen Brubaker;

(3) $1,024.48 in contributions from John Covici;

(4) $1,279.55 in cntributions from Joseph D'Urso;

(5) $3,378.34 in contributions from Elliot Eisenberg;

(6) $2,067.32 in contributions from Jeffrey Forrest;

(7) $1,409.59 in contributions from Gregory Garnier;

(8) $5,120.32 in contributions from Laurence Gray;

(9) $3,681.32 in contributions from Marjorie Mazel Hecht;

(10) $1,285.87 in contributions from Marsha Kokinda;

(11) $1,738.68 in contributions from Melvin Johnson;

(12) $1,763.76 in contributions from Michael Smedberg;

(13) $1,005.44 in contributions from Martin Simon;

(14) $1,507.65 in contributions from David W. Thill;

(15) $2,403.90 in contributions from Andrew Wilson;

(16) $1,025 in contributions from August F. Arace;

(17) $1,043 in contributions from James M. Duree;

(18) $1,105 in contributions from Shirley Fingerman;

(19) $1,030 in contributions from John Holly;

(20) $1,044 in contributions from T. J. Hopkins;

(21) $1,150 in contributions from Sherri S. Lightner;

(22) $1,100 in contributions from John Pellicano;

(23) $1,100 in contributions from John Ryman;

(24) $1,120 in contributions from John J. Sakala;

(25) $1,125 in contributions from Walter J. Stevens;

(26) $1,010 in contributions from James Taylor;

(27) $1,030 in contributions from Verne Tomlins;

(28) $1,515 in contributions from Carleton Williams;

(29) $1,580 in contributions from Frederic L. Young;

(30) $2,375 in contributions from Donald J. Carr;

(31) $2,030 in contributions from Ellen G. Scott;

(32) $1,050 in contributions from Belinda F. deGrazia;

(33) $1,250 in contributions from Alexander Ward;

(34) $1,125 in contributions from Mary F. Cummings;

(35) $1,075 in contributions from James M. Everette;

(36) $1,250 in contributions from Michael Micale.

The Commisson has not alleged that these were willful violations.

7. Respondent, through its volunteers, violated 26 U.S.C. § 9042(c)(1)(A) by knowingly and willfully submitting

false and/or misleading information to the Commission in an attempt to obtain matching funds with regard to the following contributions:

(A) MUR 1158

(1) $35 money order signed "William Hayden" and dated 1/8/80.

(2) $150 money order signed "Ernest Pulsifor" and dated 12/4/79.

(3) $250 money order signed "Nancy Radcliff" and dated 9/12/79.

(4) $250 money order signed "Robert A. Robinson" and dated 9/12/79.

(5) $140 money order signed "Kevin Salisbury" and dated 1/12/80.

(6) $450 money order signed "Kevin Salisbury" and dated 1/21/80.

(7) $70 money order signed "Charles Clark" and dated 11/13/79.

(8) $150 money order signed "Anne R. Taylor" and dated 11/20/79.

(9) $45 money order signed "David Sanders" and dated 11/25/79.

(10) $25 money order signed "David Sanders" and dated 1/3/79.

(11) $1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.

(12) $400 money order signed "Belinda F. deGrazia" and dated 1/22/80.

(13) $250 cashier's check and signature document for Dr. Harold Harrison.

3 0 4 0 1 0 0 3 7

(B) MUR 1186

(1) $40 money order signed "Harold Harper" and dated 7/17/79 accompanied by signature document dated 12/7/79.

(C) MUR 1352

(1) $200 money order signed "William Lerch" and dated 11/19/79.

(2) $55 money order signed "William Lerch" and dated 12/7/79.

(3) $135 money order signed "Sherri Waffle" and dated 12/7/79.

(4) $85 money order signed "Sherri Waffle" and dated 12/7/79.

(5) $80 money order signed "Sherri Waffle" and dated 12/7/79.

(6) $125 money order signed "Janice Hart" and dated 12/7/79.

(7) $120 money order signed "Janice Hart" and dated 12/7/79.

(8) $100 money order signed "Victoria Lacey" and dated 12/10/79.

(9) $50 money order signed "Victoria Lacey" and dated 12/10/79.

(10) $250 money order signed "Robert Hart" and dated 12/10/79.

(11) $100 money order signed "Paul Greenberg" and dated 12/10/79.

(12) $100 money order signed "Paul Greenberg" and dated 12/11/79.

V. The Commission has treated the matters described in this document as civil violations.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of fifteen thousand dollars

8 3 0 4 0 1 0 0 8 5

($15,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1) One initial payment of $5,000, due on December 1, 1982;

2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of $1,000 each;

3) Each such installment shall be paid on the first day of the month in which it becomes due;

4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VII. Respondent agrees that it shall not undertake any activity which is in violation of either the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 et seq. or the Presidential Primary Matching Payment Account Act, 26 U.S.C. § 9001 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with

this agreement. If the Commission believes that this agreement or any requirement thereof has been violated it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. Except for the conditions specified in paragraph VIII above, this agreement constitutes a complete bar to any further action by the Commission with regard to the matters set forth in this agreement. It is the understanding of the Respondent and the Commission that the execution of this agreement will result in the termination of all pending Matters Under Review concerning the respondent as of the present date, and that this agreement constitutes complete satisfaction of all such pending Matters Under Review.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

Charles N. Steele
General Counsel

Nov. 5, 1982
Date

By: Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 9, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche
Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of your client, Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its initial installment payment of that penalty, in the amount of $5,000, on December 1, 1982.

It is now December 9, and no such payment has been received by the Commission. I, therefore, direct your attention to paragraph IV, section 4 of the conciliation agreement which states:

> In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to respondent.

In order to avoid such an acceleration, CFL should forward a check to the Commission in the full amount due ($5,000) prior to December 17, 1982.

This is the only notice of deliquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT II (1 of 1)

8304000091

Federal Election Commission
1325 K Street
Washington, D.C., 20463

II

Madame and Gentlemen:

Pursuant to the provisions of the Presidential Primary Matching Payment Account Act, the 'act', and the Federal Election Commission regulations promulgated thereunder, the 'regulations', I hereby certify that I am seeking the nomination of the Democratic Party to the office of President of the United States in more than one state.

I further certify that neither I nor Citizens for LaRouche, my authorized principal campaign committee, will incur qualified campaign expenses in excess of the limitations set forth under section 9035 of the regulations.

I further certify that Citizens for LaRouche has received on my behalf matchable contributions which, totaled, exceed $5,000 in contributions from individuals who are residents of each of at least 20 states, and with respect to any individual do not exceed $250. The information required by section 9033.2 (c) (2) of the regulations with respect to such contributions is enclosed herewith.

I further certify that I have read section 9033.1 of the regulations and I hereby agree that Citizens for LaRouche and I will comply with each condition set forth set forth in section 9033.1

Citizens for LaRouche and I specifically agree to obtain and furnish to the Commission at its request any evidence regarding qualified campaign expenses by me, Citizens for LaRouche, and all authorized committees. We will include as part of this evidence the following documentation:

For expenditures exceeding $100 or for expenditures of less than $100 to a payee who receives expenditures aggregating more than $100 per year, either:

a. a receipted bill which is from the payee which states the particulars of the expenditure -- or
b. if such a receipted bill is not available, the following documents which will state the particulars of the expenditure:
1. A cancelled check negotiated by the payee-- plus
2. One of the following documents from the payee-- a bill, invoice, voucher or or contemporaneous memorandum--
3. Where the documents specified in 2. above are not available, a voucher or contemporaneous memorandum from the candidate or Citizens for LaRouche --or
c. if neither a receipted bill nor the documentation specified above is available, a cancelled check stating the particulars of the expenditure.

Where the supporting documentation required above is not available, Citizens for LaRouche and I may present a cancelled check and collateral evidence to document the qualified campaign expense. Such evidence may include but is not limited to : (a) evidence demonstrating that the expenditure is part of an identifiable program or project which is other-

a number of documented expenditures relating to a campaign mailing or to the operation of a campaign office-- (b) evidence that the expenditure is covered by a pre-established written campaign committee policy, such as per Diem policy , etc.

Citizens for LaRouche and I understand that the term 'particulars' means the identification of the payee, the date and amount of the expenditure, and a description of the goods or services purchased.

For all other expenditures:
a. if from the petty cash fund, a record disclosing the identification of the payee, the amount and the date of the expenditure-- or
b. a cancelled check which has been negotiated by the payee and states, the identification of the payee, and the amount and date of the expenditure.

Citizens for LaRouche and I understand that 'payee' means the person who provides the goods and services to the committee or candidate in return for the expenditure except for an advance of $500. or less for travel and/or subsistence to an individual who will be the recipient or the goods or services purchased.

Upon the request of the Commission, Citizens for LaRouche and I shall supply an explanation of the connection between the expenditure and the campaign.

Citizens for LaRouche and I shall keep and furnish to the Commission any books, records, including bank records for all accounts and supporting documentation for matching fund submissions , or other information that the Commission may request , as well as copies of books and records maintained by all authorized committees of the candidate.

For purposes of audit and examination pursuant to section 9038 of the regulations, and at the Commission's request , Citizens for LaRouche and I shall gather the books and records required, as stated above, in one centralized location.

Citizens for LaRouche and I shall permit an audit and examination pursuant to section 9038 of all campaign expenditures, including those made by all authorized committees-- facilitate such audit by making available office space, records , and such personnel as is necessary to conduct the audit and examination-- and pay any amounts required to be paid under section 9038.

Prior to the date of the first matching funds payment pursuant to the Act, Citizens for LaRouche and I shall submit the name and mailing address of the national or state banks designated by Citizens for LaRouche and myself as a campaign depository as required by 11 CFR part 103 and section 9037.3 of the regulations.

Citizens for LaRouche and I shall prepare matching funds submissions in accordance with the Federal Election Commission guideline for presentation in good order.

Citizens for LaRouche and I shall comply with applicable requirements of sections 431-434-437b title 2, US code and parts 100-108 of the Federal Election Commission regulations.

Citizens for LaRouche and /or I shall pay any civil penalties including in a conciliation agreement or imposed under 2 usc section 437g against me, the committee, or any authorized committee of mine.

If there are any questions regarding the above certification and agreements, please call either Felice Gelman, treasurer of Citizens for LaRouche, or James F. Schoener, counsel representing Citizens for LaRouche.

Very truly yours,

Lyndon H. LaRouche, Jr.

8304009

ATTACHMENT III (3 of 3)

ATTAC

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its $5,000 initial installment payment of that penalty on December 1, 1982, followed by ten consecutive monthly installments of $1,000 to begin January 1, 1983. The agreement further provides that if any installment payment is not received at the Commission by the fifth day of the month in which it becomes due, the Commission may accelerate the remaining payments - causing the entire amount to become due ten days after CFL receives written notice of such an acceleration.

On December 9, 1982, the Commission notified you that it had not received CFL's initial $5,000 installment and advised you that CFL should forward the $5,000 payment prior to December 17, 1982, in order to avoid acceleration of the entire amount. No such payment has been received. In addition, the first $1,000 monthly installment payment due on January 1, 1983 is now overdue.

On January , 1983, based on CFL's failure to comply with the payment schedule set forth in the conciliation agreement, the Commission authorized the acceleration of all remaining payments. Please be advised, therefore, that the entire civil penalty ($15,000) is due ten days after your receipt of this letter. Additionally, the Commission has authorized the filing of a civil

ATTACHMENT IV (1 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of Citizens for LaRouche (CFL), in which CFL agreed to pay a $15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its $5,000 initial installment payment of that penalty on December 1, 1982, followed by ten consecutive monthly installments of $1,000 to begin January 1, 1983. The agreement further provides that if any installment payment is not received at the Commission by the fifth day of the month in which it becomes due, the Commission may accelerate the remaining payments - causing the entire amount to become due ten days after CFL receives written notice of such an acceleration.

On December 9, 1982, the Commission notified you that it had not received CFL's initial $5,000 installment and advised you that CFL should forward the $5,000 payment prior to December 17, 1982, in order to avoid acceleration of the entire amount. No such payment has been received. In addition, the first $1,000 monthly installment payment due on January 1, 1983 is now overdue.

On January , 1983, based on CFL's failure to comply with the payment schedule set forth in the conciliation agreement, the Commission authorized the acceleration of all remaining payments. Please be advised, therefore, that the entire civil penalty ($15,000) is due ten days after your receipt of this letter. Additionally, the Commission has authorized the filing of a civil

ATTACHMENT IV (1 of 2)

action for relief against both CFL and Lyndon LaRouche*/ in the event that payment of the entire $15,000 is not received within 10 days of your receipt of this notice.

If you have any questions concerning the Commission's actions, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

---

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Mr. LaRouche agreed to pay any civil penalties assessed against CFL pursuant to a conciliation agreement.

3304000

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1158.

33040000097