FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1191

Date Filmed 8/16/83 Camera No. --- 3

Cameraman JBL

FEDERAL ELECTION COMMISSION

Routing Cards, Comment sheets, FBI Information, SS# Birth information, License,

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

___ (2) Internal rules and practices

___ (3) Exempted by other statute

___ (4) Trade secrets and commercial or financial information

✓ (5) Internal Documents

✓ (6) Personal privacy

___ (7) Investigatory files

___ (8) Banking Information

___ (9) Well Information (geographic or geophysical)

Signed Deborah Curry

date 10-13-82

FEC 9-21-77

8304041401 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1982

John E. Nolan, Jr.
General Counsel
Kennedy for President Committee
1250 22nd Street, N.W.
Washington, D.C. 20037

Re: MUR 1191

Dear Mr. Nolan:

This is in reference to the complaint you filed with the Commission on March 19, 1980, concerning allegations of possible violations of the Federal Election Campaign Act of 1971, as amended.

Based on your complaint, the Commission determined there was reason to believe that Citizens to Save Massachusetts from Ted Kennedy (also known as Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter the "Citizens Committee"), violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of this matter. After an investigation was conducted the Commission determined on October 4, 1982, to take no further action and close the file. This action was due to the fact that the Commission was unable to serve any papers on the Citizens Committee. Additionally, the Citizens Committee appears to have ceased any further activity involving the federal election process.

Accordingly, the file in this matter, numbered MUR 1191, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1191
Citizens Committee to Save Massachusetts from Ted Kennedy	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 4, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1191:

1. Take no further action at this time with regard to the Citizens Committee to Save Massachusetts from Ted Kennedy.

2. Close the File.

3. Approve sending the letter as submitted with the September 28, 1982, Memorandum to the Commission.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

10/4/82
Date

Judy C. Ransom
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 9-29-82, 12:15
Circulated on 48 hour tally basis: 9-29-82, 4:00

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

September 28, 1982

In the Matter of	)	
	)	MUR 1191
Citizens Committee to Save	)	
Massachusetts from Ted Kennedy	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND/PREVIOUS COMMISSION ACTION

This matter arises out of a complaint filed by the Kennedy for President Committe. It concerns possible violations of the Federal Election Campaign Act of 1971, as amended, by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter "Citizens Committee"), in connection with their distribution of leaflets.

On June 9, 1981, the Commission found reason to believe that the Citizens Committee violated 2 U.S.C. §§ 433 and 434 in connection with its distribution of two leaflets which oppose Seantor Edward M. Kennedy and otherwise appear to be for the purpose of influencing federal elections.

On June 23, 1981, the Commission authorized the issuance of an Order to Answer Written Questions and approved a notification of reason to believe letter to be served on Mr. Herbert Quinde.

In view of numerous attempts to serve Mr. Quinde by U.S. Marshall Service, the Commission on March 23, 1982 authorized the Office of General Counsel to secure a private process server to

serve the notification of reason to believe letter and Order on Mr. Quinde. The Office of General Counsel secured the services of James Smith (Accurate Legal Services) with regard to serving Mr. Quinde.

On May 6, 1982, the Office of General Counsel submitted a memorandum to the Commission requesting authorization to issue a subpoena in connection with MUR 1191. Due to the demonstrated difficulty in serving Mr. Quinde, on May 11, 1982, the Commission authorized the subpoena for Herbert Quinde to appear for deposition and to produce documents. The subpoena was signed and sealed on May 12, 1982.

The date set for deposition in the subpoena was June 7, 1982. However, Mr. Quinde could not be served by that time, since he was out of town during most of this period. At that time Mr. Smith anticipated at least another month to effect service (See Attachment 1 page 1-3 of attachments).

On June 24, 1982, the Office of General Counsel submitted a memorandum to the Commission recommending that the Commission approve the issuance of another subpoena with a new date for document production and appearance for oral deposition of August 6, 1982. To facilitate service, the Office of General Counsel requested the signing of five copies of the subpoena. The subpoenas were signed and sealed on June 28, 1982.

Accurate Legal Services was unable to serve Mr. Herbert Quinde by August 6, 1982. The report states that he was evading service of process (See Attachment 2 pages 4-6 of attachments).

This matter has been in the investigation stage for two years without any progress. Numerous avenues have been explored (mail, telephone, U.S. Marshall Service, Private Process Server), and numerous attempts have been made to effect service on Mr. Quinde without success. The efforts of the Office of General Counsel in this matter clearly demonstrates that Mr. Quinde has evaded service and will continue to do so in the future.

It would be hard to develop the facts of this case without answered questions. Moreover, it appears that this was a one time occurrence and that the Citizens Committee has ceased any further activity involving the Federal election process. Therefore, the Office of General Counsel recommends that the Commission take no further action at this time and close the file.

II. RECOMMENDATION

It is recommended that the Commission:

1. take no further action at this time with regard to the Citizens Committee to Save Massachusetts from Ted Kennedy;

2. close the file; and

3. approve sending the attached letter to the complainant.

Sept 29, 1982
Date

Charles N. Steele
General Counsel

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

Attachments
1. First Report of Private Process Server
2. Second Report of Private Process Server
3. Letter to Complainant

ACCURATE LEGAL SERVICES CO., INC. Washington, D.C. 20002 (202) 547-2716

INVOICE No.

Firm:
FEDERAL ELECTION COMMISSION
1325 K. Street, N. W.
Washington, D.C. 20463

Date: June 25, 1982
Court:
Case Number:
Case Title: Herbert Quinde

Special Instructions:

Attachment 1

Attention: Debra Curry

Document: Letter, Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and Other Relevant Documents, and Letter and Order with Exhibits A & B

Atty. File Number:

Serve: HERBERT QUINDE

(PLEASE INDICATE NAME EXACTLY AS IT SHOULD APPEAR ON PROOF OF SERVICE)

JUN 28 P4:50

RECEIVED
OGC-ELECTION COMMISSION

RESIDENCE ADDRESS:

BUSINESS ADDRESS:

HOURS WORKED:

HEARINGS: SET FOR AT DEPT. LAST DATE TO SERVE:

DESCRIPTION: AGE HEIGHT WEIGHT RACE SEX MARKS

ITEM	CHARGES
Report:	
Federal Express.....	$19.00
NO SERVICE (Fee for attempts of service - affidavits attached)	$100.00
TELEPHONE EXPENSE...	17.85
TOTAL	$136.85

☐ PERSONAL SERVICE
☐ SUBSTITUTED SERVICE
☐ NOT SERVED

DATE | A.M. | P.M. | PROCESS SERVER

8304041402 3

STATE OF NEW YORK

----------X

IN THE MATTER UNDER REVIEW 1191

(2)

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the SUBPOENA AND LETTERS on May 20, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address: 62-07 39th Ave., Woodside, Queens, NY.

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
( ) Party is evading service.
( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:
Service was attempted on the following dates & times; May 26, 1982 8:00 am; May 29, 1982 at 11:00 am; June 3, 1982 at 4:00 pm; June 4, 1982 at 6:11pm; June 5th 1982 at 8:50 am; June5th, 1982 at 9:00 pm

8504041402 4

JUN 29 P 4:58

William R. De Lange

William R. De Lange
#741400

Sworn to before me this

June 22, 1982

Gail Williams

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County
Commission Expires March 30, 1983

STATE OF NEW YORK

----------X

IN THE MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the Subpoena and Letters on May 20, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address: c/o Campaign Publications, 304 West 58th Street, New York, NY.

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
( ) Party is evading service.
(XX) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:

Service was attempted on the following dates & times: 5/25/82 10:00 am 5/27/82 3:05 pm; June 1, 1982 at 9:07 am; 6/2/82 2:17 pm; June 4, 1982 2:30 pm; June 4, 1982 at 4:00 pm. On each of the aforementioned attempts your deponent was informed by a co-worker of Herbert Quinde that he was not in. Your deponent tried to ascertain when he would be available but this person declined to say.

JUN 29 P4:58

William R. De Lange
William R. De Lange
#741400

Sworn to before me this
June 22, 1982
Gail Williams

4

ACCURATE LEGAL SERVICES COMPANY, INC.
P.O. Box 1532
Washington, D.C. 20013
306 H Street, N.E.
Washington, D.C. 20002 (202) 547-5710

INVOICE NO. 772

(4)

Firm: FEDERAL ELECTION COMMISSION
1325 K. Street, N.W.
Washington, D.C. 20463

Attention: Deborah Curry

Date: August 20, 1982

Attachment 2

CASE NO.		FILE NO.	CHARGES
	RE: Service on HERBERT QUINDE		
	ATTEMPTS OF SERVICE AND WAITING TIME.....		$125.00
	(Attached are affidavits showing attempts		
	of service upon Mr. Quinde)		
	TELEPHONE EXPENSE...		33.25
	TOTAL AMOUNT DUE.....		$158.25

BEFORE THE
UNITED STATES OF AMERICA FEDERAL ELECTION COMMISSION

MATTER UNDER REVIEW 1191

(5)

NON ESTES
RETURN/STATUS

---X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the Letter & Subpoena on July 2, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address: p/o/e Campaigner Publications, 304 West 58th Street, New York, NY.
H/A 62-07 Thirty-Nineth Ave., Woodside, Queens, NY

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
(XX) Party is evading service.
( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:

Service was attempted on the following dates at the office address:
7/3/82 9:11 am; 7/6/82 11:00 am; 7/8/82 4:10 pm; 7/14/82 2:40 pm;
7/29/82 2:10 pm; 8/2/82 9:41 am; 8/3/82 12:00 pm

Service was attempted on the following dates at the home address:
7/6/82 7:15 pm; 7/8/82 8:20 pm 7/10/82 8:08 am; 7/16/82 6:06 pm;
7/17/82 8:12 am; 8/2/82 9:20 pm; 8/3/82 6:55 pm

William R. De Lange
William R. De Lange

Sworn to before me this
August 6, 1982
Gail Williams

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County

4

UNITED STATES OF AMERICA; FEDERAL ELECTION COMMISSION

MATTER UNDER REVIEW 1191

(6)

NON ESTES
RETURN/STATUS

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the Letter & Subpoena on July 2, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address:
home address: 62-07 Thirty-Nineth Avenue, Woodside, Queens, NY.
p/o/e Campaigner Publications 304 West 58th Street, New York, NY

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
(XX) Party is evading service.
( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:

Service was attempted on the following dates and times:
7/6/82 9:20 am p/o/e, 7/9/82 3:40 pm p/o/e, 7/10/82 8:50 am H/A;
7/15/82 8:30 pm H/A 7/20/82 10:10 am p/o/e, 7/24/82 11:20 am H/A;
7/27/82 2:45 p/o/e

Betty L. Thompson

Sworn to before me this
August 6, 1982.
Gail Williams

4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 3

John E. Nolan, Jr.
General Counsel
Kennedy for President Committee
1250 22nd Street, N.W.
Washington, D.C. 20037

Re: MUR 1191

Dear Mr. Nolan:

This is in reference to the complaint you filed with the Commission on March 19, 1980, concerning allegations of possible violations of the Federal Election Campaign Act of 1971, as amended.

Based on your complaint, the Commission determined there was reason to believe that Citizens to Save Massachusetts from Ted Kennedy (also known as Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter the "Citizens Committee"), violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of this matter. After an investigation was conducted the Commission determined on October , 1982, to take no further action and close the file. This action was due to the fact that the Commission was unable to serve any papers on the Citizens Committee. Additionally, the Citizens Committee appears to have ceased any further activity involving the federal election process.

Accordingly, the file in this matter, numbered MUR 1191, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

ACCURATE LEGAL SERVICES COMPANY, INC.

P.O. Box [illegible]
Washington, D.C. 20013
[illegible] H Street, N.E.
Washington, D.C. 20002 (202) 547-5710

INVOICE NO. 772

Firm: FEDERAL ELECTION COMMISSION
1325 K. Street, N.W.
Washington, D.C. 20463

Attention: Deborah Curry

Date: August 20, 1982

A.C.

CASE NO.		FILE NO.	CHARGES
	RE: Service on HERBERT QUINDE		
	ATTEMPTS OF SERVICE AND WAITING TIME.....		$125.00
	(Attached are affidavits showing attempts		
	of service upon Mr. Quinde)		
	TELEPHONE EXPENSE...		33.25
	TOTAL AMOUNT DUE.....		$158.25

8304140311

UNITED STATES OF AMERICA; FEDERAL ELECTION COMMISSION

MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the Letter & Subpoena on July 2, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address:
Home address: 62-07 Thirty-Nineth Avenue, Woodside, Queens, NY.
W/o/e Campaigner Publications 304 West 58th Street, New York, NY

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
(XX) Party is evading service.
( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:

Service was attempted on the following dates and times:
7/5/82 9:20 am p/o/e, 7/9/82 3:40 pm p/o/e, 7/10/82 8:50 am H/A;
7/15/82 8:30 pm H/A 7/20/82 10:10 am p/o/e, 7/24/82 11:20 am H/A;
7/27/82 2:45 p/o/e

8304041403 2

Betty L. Thompson

Sworn to before me this
August 6, 1982.

Gail Williams

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County
Commission Expires March 30, 198_4

XEROX
UNITED STATES OF AMERICA, FEDERAL ELECTION COMMISSION
----------X
MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
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Service was attempted on the following dates at the office address:
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/29/82 2:10 pm; 8/2/82 9:41 am; 8/3/82 12:00 pm

Service was attempted on the following dates at the home address:
/6/82 7:15 pm; 7/8/82 8:20 pm 7/10/82 8:08 am; 7/16/82 6:06 pm;
7/17/82 8:12 am; 8/2/82 9:20 pm; 8/3/82 6:55 pm

8304041403 3

William R. De Lange
William R. De Lange

Sworn to before me this
August 6, 1982
Gail Williams

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County
Commission Expires March 30, 1984

XXXXXXXX
UNITED STATES OF AMERICA, FEDERAL ELECTION COMMISSION
----------X
MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
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7/17/82 8:12 am; 8/2/82 9:20 pm; 8/3/82 6:55 pm

William R. De Lange

Sworn to before me this
August 6, 1982

GAIL WILLIAMS
Notary Public, State of New York

4

8304041403

XXXXXXXX

UNITED STATES OF AMERICA; FEDERAL ELECTION COMMISSION

----------X

MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the _____
Letter & Subpoena on July 2, 1982 and
after due and diligent search and inquiry, I am unable to find the within
med Herbert Quinde at the following address: _____
e address: 62-07 Thirty-Nineth Avenue, Woodside, Queens, NY .
/e Campaigner Publications 304 West 58th Street, New York, NY

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( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

emarks:

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5/82 8:30 pm H/A 7/20/82 10:10 am p/o/e, 7/24/82 11:20 am H/A;
27/82 2:45 p/o/e

Betty L. Thompson

Sworn to before me this
August 6, 1982.
Gary Williams

4

83040143

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1982

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on August 6, 1982 at at 10:00 a.m. in Courtroom 208 at the Federal Building 26 Federal Plaza, New York, N.Y. have been issued.

The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4529 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at 10:00 a.m. in Courtroom 208 at the Federal Building, 26 Federal Plaza, New York, N.Y. on August 6, 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on August 6, 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 29th day of June, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1982

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on August 6, 1982 at at 10:00 a.m. in Courtroom 208 at the Federal Building 26 Federal Plaza, New York, N.Y. have been issued.

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You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4529 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

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b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 29th day of June, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1982

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FIRST CLASS

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ACCURATE LEGAL SERVICES
CO., INC.
306 H STREET, N.E.
WASHINGTON, D.C. 20002

TO: FEDERAL ELECTION
COMMISSION

1325 K. Street, N. W.
Washington, D.C. 20463

ATTN: Deborah Curry

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1982

Elsie Moran
Courtroom Facilities
U.S. Tax Court
400 2nd Street, N.W.
Room G43
Washington, D.C. 20217

Dear Ms. Moran:

Per your request, this letter constitutes written confirmation that the Federal Election Commission has cancelled its reservation for Courtroom 208 in New York on August 6, 1982. Thank you for your consideration in this matter.

Sincerely,

Gary L. Johansen

Gary Johansen
Assistant General Counsel

8304041405 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1982

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Enclosed please find five copies of the papers to be served on Herbert Quinde.

If you have any questions, please contact Deborah Curry the attorney assigned to this matter at (202)523-4529. Thank you.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
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Enclosure

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FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JUNE 29, 1982

SUBJECT: SUBPOENAS RE: MUR 1191

The attached subpoenas which were approved on June 28, 1982 by a vote of 6-0, have been signed and sealed this date.

Attachment:
Subpoenas (5)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1191
Herbert Quinde)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 28, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1191:

1. Authorize the subpoena to Herbert Quinde as attached to the Memorandum to the Commission dated June 24, 1982.

2. Approve the letter to Herbert Quinde as submitted with the June 24, 1982 Memorandum to the Commission.

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

Attest:

6-28-82
Date

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

8304041400

6 letters

Received in Office of Commission Secretary: 6-24-82, 9:55
Circulated on 48 hour tally basis: 6-24-82, 4:00

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WASHINGTON, D.C. 20463

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

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James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Enclosed please find five copies of the papers to be served on Herbert Quinde.

If you have any questions, please contact Deborah Curry the attorney assigned to this matter at (202)523-4529. Thank you.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1191
Herbert Quinde)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 28, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1191:

1. Authorize the subpoena to Herbert Quinde as attached to the Memorandum to the Commission dated June 24, 1982.

2. Approve the letter to Herbert Quinde as submitted with the June 24, 1982 Memorandum to the Commission.

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

Attest:

6-28-82
Date

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

Received in Office of Commission Secretary: 6-24-82, 9:55
Circulated on 48 hour tally basis: 6-24-82, 4:00

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 JUN 24 A 9: 55

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Authorization to Issue New Subpoena in Connection with MUR 1191

This matter arises out a complaint filed by the Kennedy for President Committee. It concerns possible violations of the Federal Election Campaign Act of 1971, as amended, by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter "Citizens Committee"), in connection with their distribution of leaflets.

On June 9, 1981, the Commission found reason to believe that the Citizens Committee violated 2 U.S.C. §§ 433 and 434 in connection with its distribution of two leaflets which oppose Senator Edward M. Kennedy and otherwise appear to be for the purpose of influencing federal elections.

On June 23, 1981, the Commission authorized the issuance of an Order to Answer Written Questions and approved a notification of reason to believe letter to be served on Mr. Herbert Quinde.

In view of numerous attempts to serve Mr. Quinde by U.S. Marshall Service, the Commission on March 23, 1982 authorized the Office of General Counsel to secure a private process server to serve the notification of reason to believe letter and Order on Mr. Quinde. The Office of General Counsel secured the services of James Smith with regard to serving Mr. Quinde.

On May 6, 1982, the Office of General Counsel submitted a memorandum to the Commission requesting authorizaton to issue a subpoena in connection with MUR 1191. Due to the demonstrated difficulty in serving Mr. Quinde, on May 11, 1982, the Commission authorized the subpoena for Herbert Quinde to appear for deposition and to produce documents. The subpoena was signed and sealed on May 12, 1982.

The date set for deposition in the subpoena was June 7, 1982. However, Mr. Quinde could not be served by that time.

On June 2, 1982, James Smith (process server) stated that Mr. Quinde had been out of town for part of the time period, but was expected back on June 3, 1982. Mr. Smith indicated that they would try to serve the subpoena if he returned. However, they were unable to do so.

Mr. Smith also states that they have not incurred many expenses yet. Primarily, the process servers in New York have been compiling a list of Mr. Quinde's habits, friends and other leads so that a possible plan for service could be developed.

Mr. Smith states that Mr. Quinde is living with his parents in Queens and still working at Campaigner Publications (which is difficult to get into). Mr. Smith indicated that service has been hampered because there is only one original of the documents to be served. Since New York has five boroughs with agents in each, he suggests that we send at least five copies of the documents so that an agent in each borough can have one instead of one agent running from borough to borough. Mr. Smith anticipates that it will take at least another month to effect service.

In light of the foregoing, the Office of General Counsel recommends that the Commission approve the issuance of the attached subpoena (five signed copies) with a new date for document production and appearance for oral deposition of August 6, 1982.

Recommendation

1. Authorize the attached subpoena to Herbert Quinde

2. Approve the attached letter to Herbert Quinde

Attachments
1. Copy of Subpoena (1)
2. Copy of Letter (1)

Attachment 1 (1)

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at 10:00 a.m. in Courtroom 208 at the Federal Building, 26 Federal Plaza, New York, N.Y. on August 6, 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on August 6, 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day of , 1982.

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

(3)

Attachment 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on August 6, 1982 at at 10:00 a.m. in Courtroom 208 at the Federal Building 26 Federal Plaza, New York, N.Y. have been issued.

The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

(4)

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4529 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

STATE OF NEW YORK

----------X

IN THE MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the Subpoena and Letters on May 20, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address: c/o Campaign Publications, 304 West 58th Street, New York, NY.

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
( ) Party is evading service.
(XX) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:

Service was attempted on the following dates & times: 5/25/82 10:00 am 5/27/82 3:05 pm; June 1, 1982 at 9:07 am; 6/2/82 2:17 pm; June 4, 1982 2:30 pm; June 4, 1982 at 4:00 pm. On each of the aforementioned attempts your deponent was informed by a co-worker of Herbert Quinde that he was not in. Your deponent tried to ascertain when he would be available but this person declined to say.

William R. De Lange
#741400

Sworn to before me this
June 22, 1982

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County
Commission Expires March 30, 1983

STATE OF NEW YORK

----------X

IN THE MATTER UNDER REVIEW 1191

NON ESTES
RETURN/STATUS

----------X

NOW COMES THE UNDERSIGNED DEPONENT, being duly sworn upon their oath, who deposes and says:
They are over the age of eighteen years and are not a party to this action.
I hereby declare under penalty of perjury that I received the SUBPOENA AND LETTERS on May 20, 1982 and after due and diligent search and inquiry, I am unable to find the within named Herbert Quinde at the following address: 62-07 39th Ave., Woodside, Queens, NY.

Service has not been effected because:

( ) Moved, Forwarding address unknown.
( ) Unknown at address.
( ) Incorrect place for service.
( ) No such address.
( ) No longer employed at Place of Business.
( ) Party is evading service.
( ) Party could not be served within the prescribed time before hearing date.
( ) Party deceased.

Remarks:
Service was attempted on the following dates & times: May 26, 1982 8:00 am; May 29, 1982 at 11:00 am; June 3, 1982 at 4:00 pm; June 4, 1982 at 6:11pm; June 5th 1982 at 8:50 am; June5th, 1982 at 9:00 pm

83041409 5

RECEIVED
GENERAL COUNSEL
82 JUN 29 P4:58

William R. De Lange
William R. De Lange
#741400

Sworn to before me this
June 22, 1982
Gail Williams

GAIL WILLIAMS
Notary Public, State of New York
Qualified in Westchester County
Commission Expire March 30, 198_

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1982

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

Attached are copies of a letter and Order issued to you by the Federal Election Commission. We have made several attempts to deliver the original documents to you, however, such attempts have failed. Should you require original documents, the Commission will furnish such documents upon your request.

If you have any questions, please direct them to Deborah Curry at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Copy of Letter from John Warren McGarry dated June 29, 1981
Copy of Order to Answer Written Questions with attached Exhibits A and B

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June, 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

EXHIBIT B

Will Teddy Pull the Plug on Rose?

Be aware this garbage is being distributed in Boston. This is an example of what's wrong with PAC. This and the fact they are buying a government.

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] a campaign operational in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-1698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

8304041100

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

Herbert Quinde
c/o Campaigner Publications
304 W. 58th Street
Re: MUR 1191

Res
62-0739 Ang
Woodside

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on June 7, 1982 at at 10:00 a.m. in Courtroom 208 at the Federal Building 26 Federal Plaza, New York, N.Y. have been issued.

The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4529 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at 10:00 a.m. in Courtroom 208 at the Federal Building, 26 Federal Plaza, New York, N.Y. on June 7, 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on June 7, 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 12th day of May, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

ACCURATE LEGAL SERVICES COMPANY, INC.

306 H. STREET N.E. • WASHINGTON, D.C. 20002

POSTAGE DUE

FEDERAL ELECTION COMMISSION
1325 K. Street, N.W.
Washington, D.C. 20463

ATTN: Debra Curry

WAS 20002

Domestic Mail

US Postage

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1982

Ms. Elsie Moran
Courtroom Facilities Office
Room G43
U.S. Tax Court
400 2nd Street, N.W.
Washington, D.C. 20217

Dear Ms. Moran:

This letter is written to confirm the reservation of Courtroom 208 in the Federal Building 26 Federal Plaza New York, N.Y., on August 6, 1982 by the Federal Election Commission. I will be the presiding officer at that meeting.

If you have any questions or schedule changes, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4529. Thank You.

Sincerely,

Gary L. Johansen by KH

Gary L. Johansen
Assistant General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1982

Acme Reporting Company
1411 K Street, N.W.
Suite 600
Washington, D.C. 20005

Dear Madam:

This letter is written confirmation of the Federal Election Commission's use of your service in New York. As agreed in our telephone conversation June 15, 1982, a court reporter will be available for our use in Courtroom 208, Federal Building, 26 Federal Plaza, New York, New York on August 6, 1982.

Purchase order numbers are given after billing. Therefore, bill directly to Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

If you have any questions or schedule changes please contact, Deborah Curry the attorney assigned to this matter, at (202)523-4529. Thank you.

Sincerely,

Gary L. Johansen by KAG

Gary L. Johansen
Assistant General Counsel

8304041407

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

Ms. Elsie Moran
Courtroom Facilities Office
Room G43
U.S. Tax Court
400 2nd Street, N.W.
Washington, D.C. 20217

Dear Ms. Moran:

This letter is written to confirm the reservation of Courtroom 208 in the Federal Building 26 Federal Plaza New York, N.Y., on June 7, 1982 by the Federal Election Commission. I will be the presiding officer at that meeting.

If you have any questions or schedule changes, please contact Deborah Curry, the attorney assigned to this matter, at (202)523-4529. Thank You.

Sincerely,

Gary L. Johansen

Gary L. Johansen
Assistant General Counsel

8304041408

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

Acme Reporting Company
1411 K Street, N.W.
Suite 600
Washington, D.C. 20005

Dear Madam:

This letter is written confirmation of the Federal Election Commission's use of your service in New York. As agreed in our telephone conversation Thursday, May 13, 1982, a court reporter will be available for our use in Courtroom 208, Federal Building, 26 Federal Plaza, New York, New York on June 7, 1982.

Purchase order numbers are given after billing. Therefore, bill directly to Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

If you have any questions or schedule changes please contact, Deborah Curry the attorney assigned to this matter, at (202)523-4529. Thank you.

Sincerely,

Gary L. Johansen

Gary L. Johansen
Assistant General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Enclosed please find the second set of papers to be served on Herbert Quinde. Therefore, you will be able to serve both set of papers on Mr. Quinde in New York simultaneously.

If you have any questions, please contact Deborah Curry the attorney assigned to this matter at (202)523-4529. Thank you.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Enclosed please find the second set of papers to be served on Herbert Quinde. Therefore, you will be able to serve both set of papers on Mr. Quinde in New York simultaneously.

If you have any questions, please contact Deborah Curry the attorney assigned to this matter at (202)523-4529. Thank you.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

D.C

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Enclosed please find the second set of papers to be served on Herbert Quinde. Therefore, you will be able to serve both set of papers on Mr. Quinde in New York simultaneously.

If you have any questions, please contact Deborah Curry the attorney assigned to this matter at (202)523-4529. Thank you.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosure

8 3 0 4 0 4 1 4 1 1 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1982

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on June 7, 1982 at at 10:00 a.m. in Courtroom 208 at the Federal Building 26 Federal Plaza, New York, N.Y. have been issued.

The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4529 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at 10:00 a.m. in Courtroom 208 at the Federal Building, 26 Federal Plaza, New York, N.Y. on June 7, 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on June 7, 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 12th day of May, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Herbert Quinde

D.C.

Re: MUR 1191

Dear Mr. Quinde:

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The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

D.C

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

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Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on June 7, 1982, at the above stated location:

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b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 12th day of May, 1982.

Frank P. Reiche
Frank P. Reiche, 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 N. STEELE

FROM: MARJORIE W. EMMONS/JODY RANSOM

DATE: MAY 12, 1982

SUBJECT: SUBPOENA RE: MUR 1191

The attached subpoena, which was Commission approved on May 11, 1982, by a vote of 6-0, has been signed and sealed this date.

Attachment:
Subpoena (Quinde)

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at at on June , 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on June , 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 12th day of May, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1191
Herbert Quinde)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1191:

1. Authorize the subpoena to Herbert Quinde as submitted with the May 6, 1982 Memorandum to the Commission.

2. Approve the letter to Herbert Quinde as attached to the Memorandum to the Commission dated May 6, 1982.

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

Attest:

5-11-82
Date

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

8304041124

Received in Office of Commission Secretary: 5-6-82, 2:41
Circulated on 48 hour tally basis: 5-7-82, 2:00

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Authorization to Issue Subpoena in connection with MUR 1191

This matter arises out of a complaint filed by the Kennedy for President Committee. It concerns possible violations of the Federal Election Campaign Act of 1971, as amended, by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter "Citizens Committee"), in connection with their distribution of leaflets.

On June 9, 1981, the Commission found reason to believe that the Citizens Committee violated 2 U.S.C. §§ 433 and 434 in connection with its distribution of two leaflets which oppose Senator Edward M. Kennedy and otherwise appear to be for the purpose of influencing federal elections.

On June 23, 1981, the Commission authorized the issuance of an Order to Answer Written Questions and approved a notification of reason to believe letter to be served on Mr. Herbert Quinde.

In view of numerous attempts to serve Mr. Quinde by U.S. Marshall service, the Commission on March 23, 1982 authorized the Office of General Counsel to secure a private process server to serve the notification of reason to believe letter and Order on Mr. Quinde. The Office of General Counsel has secured the services of James Smith

with regard to serving Mr. Quinde.

The Office of General Counsel is of the opinion that it would serve the expeditious handling of this case if Mr. Quinde is also served with a subpoena to appear for deposition and to produce documents. This view is premised on the already demonstrated difficulty in serving Mr. Quinde. Therefore, the simultaneous serving of the reason to believe notification and order and subpoena for deposition will further insure that the questions will be answered. Additionally, the Commission will be spared the financial burden of later serving Mr. Quinde the subpoena to appear for deposition in the likely event that answers to the interrogatories do not prove satisfactory.

Consequently, the OGC recommends that the Commission approve the issuance of the attached supboena for documents and appearance for oral deposition.

RECOMMENDATION

1. Authorize the attached subpoena to Herbert Quinde.

2. Approve the attached letter to Herbert Quinde.

Attachments
Copy of Subpoena (1)
Copy of Letter (1)

ATTACHMENT I

(1)

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Herbert Quinde

RE: Matter Under Review 1191

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to appear for deposition as a witness in connection with the Commission's investigation of possible violations of 2 U.S.C. §§ 433 and 434 by the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as the Citizens to Protect Massachusetts from Ted Kennedy).

Notice is hereby given that the deposition is to be taken at at on June , 1982, and any and all dates adjourned to by the Commission.

Pursuant to 2 U.S.C. § 437d(a)(4), you are hereby ordered to produce on June , 1982, at the above stated location:

a) Any records, or books relating to the operation of the Citizens Committee to Save Massachusetts from Ted Kennedy, particularly receipts and expenditure information.

b) Any bank statements that relate to the Citizens Committee to Save Massachusetts, particularly deposit and withdrawal information.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day of , 1982.

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

ATTACHMENT II

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

(3)

Herbert Quinde

Re: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. In connection with an investigation being conducted by the Commission, the attached subpoena, which requires you to produce copies of certain documents, and to appear as a witness and give sworn testimony on June , 1982 at

have been issued.

The testimony will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Since the documents and testimonies are 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 the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney who may assist you in submitting documents and accompany 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

4

Please confirm your scheduled appearance with Deborah Curry on our toll free line (800-424-9530) or 202-523-4039 within ten days of your receipt of this notification. If you have any questions please direct them to Deborah Curry, the attorney assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1982

MUR 1191

James Smith
Accurate Legal Services
306 H Street, N.E.
Washington, D.C. 20002

Dear Mr. Smith:

Pursuant to our conversation on Wednesday, April 21, 1982, I am writing to request your assistance in perfecting service upon Mr. Herbert Quinde in New York.

As you know attempts to serve Herbert Quinde by other means have proven unsuccessful and we believe it likely that he may try to avoid service by your office. You are authorized to spend up to $1,000 in serving Mr. Quinde. The Commission will have to give additional authorization for any amount over $1,000.

As we discussed, the papers to serve on Mr. Quinde will be sent under separate cover after approval by the Commission.

The following information is provided to assist you in your efforts.

1. Person to be served: Herbert Quinde

2. Place of Business: Campaigner Publications, 304 West 58th Street, New York. This is perhaps the best place to serve Mr. Quinde.

3. Parent's Home Address: 62-07 Thirty-Nineth Avenue, Woodside, Queens, 11377.

4. Mr. Quinde maintains a residence in Dorchester, Massachusetts at 118 Beaumont Street, Floor 1, Suite 1. Roommate's name is Michael Gelbert. However, Quinde is out of town most of the time.

5. Wifes' name: Martha Mohoney Quinde

6. U.S. Marshall's who have assisted in this matter and may have further information:

a. James Hartigan, U.S. Marshall
Civil Section
McCormack Post Office and Courthouse
Boston, Massachusetts 02109
(617) 223-2851

Mr. Hartigan obtained a picture of Quinde. Perhaps he still has it.

b. George Grant, U.S. Marshall
114 U.S. Courthouse Annex
One St. Andrews Plaza
New York, New York 10007
(212) 791-1100
(212) 791-9750

c. Salvatore Salmieri
225 Cadman Plaza East
Brooklyn, New York 11201

Thank you in advance for your assistance in this matter. If you have any questions please contact Deborah Curry, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth H. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Citizens Committee to Save Massachusetts from Ted Kennedy	)	MUR 1191
	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's executive session on March 23, 1982, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 1191:

1. Reject the General Counsel's recommendation to close the file in this matter.

2. Direct the Office of General Counsel to employ the use of a private processor to serve the notification of reason to believe letter and Order upon Mr. Quinde.

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

Attest:

3/24/82
Date

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: MARCH 16, 1982

SUBJECT: OBJECTION - MUR 1191 General Counsel's Report dated March 10, 1982; Received in OCS, 3-11-82, 2:47

The above-named document was circulated to the Commission on March 12, 1982 at 2:00.

Commissioner Harris submitted an objection to this matter at 3:14, March 15, 1982.

This matter will be placed on the agenda for the Executive Session of Tuesday, March 23, 1982.

BEFORE THE FEDERAL ELECTION COMMISSION

March 10, 1982

SENSITIVE

In the Matter of)
) MUR 1191
Citizens Committee to Save)
Massachusetts from Ted Kennedy)

GENERAL COUNSEL'S REPORT

I. Background

On March 19, 1980, the Kennedy for President Committee filed a complaint with the Federal Election Commission alleging that the Citizens Committee to Save Massachusetts from Ted Kennedy (also known as Citizens to Protect Massachusetts from Ted Kennedy) (hereinafter "Citizens Committee") violated certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the distribution of leaflets.

On June 23, 1980, the Office of General Counsel informed the Commission of its unsuccessful attempts to notify the respondent of the complaint pursuant to 2 U.S.C. § 437g(a)(1). The only information available for determining the whereabouts of the respondent was a telephone number appearing on the leaflets. On July 1, 1980, the Commission directed that this matter be referred back to the Office of General Counsel for the purpose of further investigation. The Office of General Counsel sent an Order to Answer Written Questions to the general security manager of the New England Telephone Company. On August 4, 1980, the New

England Telephone Company revealed that Mr. Herbert Quinde, residing at 118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts, established an account for the telephone number in question in August of 1979.

On August 6, 1980, the Office of General Counsel sent notification of the complaint to Mr. Quinde by certified mail. The notification was returned unclaimed on September 4, 1980. On September 5, 1980, the Office of General Counsel sent notification of the complaint by first class mail to Mr. Herbert Quinde. There was no response nor postal return.

On June 9, 1981, the Commission found reason to believe that the Citizens Committee violated 2 U.S.C. §§ 433 and 434 in connection with its distribution of two leaflets which oppose Senator Edward M. Kennedy and otherwise appear to be for the purpose of influencing federal elections. The Commission made no finding on June 9, 1981, as to whether the leaflets reached the level of "express advocacy" necessary to support a 2 U.S.C. § 441d violation. In so doing, the Commission agreed with the Office of General Counsel's recommendation that the investigation based on findings of possible violations of §§ 433 and 434 would lead to fuller development of the facts of the case.

On June 23, 1981, the Commission authorized the issuance of an Order to Answer Written Questions and approved a notification of reason to believe letter to be served on Mr. Herbert Quinde, an apparent agent of the respondent. By letter dated June 29, 1981, the Office of General Counsel requested the assistance of

Mr. James I. Hartigan, U.S. Marshal of Boston, Massachusetts, to serve notification of findings and Order upon Mr. Herbert Quinde at the residence identified by the New England Telephone Company. On July 17, 1981, the Office of General Counsel received a report on the attempts, made by the U.S. Marshal service, without success, to serve papers on Mr. Herbert Quinde. (See Attachment I, pages 1-4 of attachments).

The report identified Mr. Quinde as an employee of a national news service. The U.S. Marshal Service verified that Mr. Quinde was presently employed by Campaigner Publications.

By letter dated July 21, 1981, the Office of General Counsel requested the assistance of the U.S. Marshal for the Seventh District of New York, to serve the Commission's notification of reason to believe letter and Order on Mr. Herbert Quinde at Campaigner Publications headquarters in New York.

On August 18, 1981, the Office of General Counsel received a handwritten report from Salvatore Salmieri with the U.S. Marshal Service. The report stated that three attempts had been made to serve Mr. Herbert Quinde at his place of employment: 304 West 58th Street, New York (Campaigner Publications). According to the report, the reception area of Campaigner Publication on the fifth floor is under maximum security, with the receptionist in a bubble type locked booth. The report states that she communicates with you by telephone. After asking for Quinde, she makes an office call and replies that he is not

in, nor is his schedule available. (See Attachment II, page 5 of attachments). The report suggests service at Mr. Quinde's residence, 62-07 Thirty-Ninth Avenue in Woodside, Queeens.

On August 20, 1981, the Office of General Counsel requested the U.S. Marshal Service in Brooklyn, New York, to serve the Commission's notification of findings and Order on Mr. Quinde at 62-07 Thirty-Ninth Avenue, Woodside, Queens, New York 11377. On October 30, 1981, we received a report on the attempts of the Marshal Service to serve at the above-mentioned address. The Queens address turned out to be the address of Mr. Quinde's parents, who stated that he was out of the country, but would return around Labor Day. Again, on September 9, 1981, the U.S. Marshal attempted to serve Quinde at the Queens address but no one was home. In addition, two more attempts were made to serve Mr. Quinde again at his work place without success. (See Attachment III, page 6 of attachments). On January 5, 1982, the Office of General Counsel re-sent the Commission's notification of reason to believe letter and Order to Mr. Quinde via regular mail at his place of business in New York.

II. Factual and Legal Analysis

2 U.S.C. § 433 requires all committees to file a Statement of Organization within ten (10) days after becoming a political committee within the meaning of 2 U.S.C. § 431(4). 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar

year or which makes expenditures 1/ aggregating in excess of $1,000 during a calendar year." In addition, 2 U.S.C. § 434 requires the treasurer of a political committee to file reports of receipts and expenditures in accordance with the provisions therein.

The Citizens Committee to Save Massachusetts from Ted Kennedy describes itself as a "non-partisan coalition of city workers, ethnic minorities, labor unions and businessmen." It is alleged by complainant that the Citizens Committee distributed leaflets (bearing its name) expressly advocating the defeat of Edward Kennedy. The two leaflets in question make unambiguous reference to Edward Kennedy and set forth his position on certain health issues.

The cost of printing and distributing the leaflets are unknown. The dates upon which the leaflets were distributed are unknown. Furthermore, the party or parties responsible for the distribution of the leaflets have not been fully identified. These questions are pivotal in determining the validity of an alleged violation of 2 U.S.C. § 433 and § 434. If the questioned communications were distributed during the period of intense political activity surrounding the Democratic nomination process or subsequent to a declaration of candidacy, it would appear that

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1/ 2 U.S.C. § 431(9)(A) defines "expenditure" as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing an election for Federal office."

such communications, which criticize the Senator's conduct, may have been designed to influence the Presidential nomination. In addition, if the costs incurred in printing and distribution of the communications are found to exceed $1,000, then there would be support for the allegations of 2 U.S.C. §§ 433 and 434 violations for failure to register as a political committee and to report expenditures made in connection with the distribution of leaflets which seek to influence a federal election.

III. Recommendation

The Office of General Counsel recommends that the Commission close the file in this matter since numerous attempts to serve the notification of reason to believe letter and Order upon Mr. Quinde have proven unsuccessful. Without answers to the Order, it would be difficult to develop the facts of this case. It further appears that this was a one time occurrence and the Citizens Committee has ceased any further activity involving the federal election process.

Charles N. Steele
General Counsel

March 11, 1982
Date

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

Attachments

1. Report U.S. Marshal Service, Massachusetts (4 pages)
2. Report U.S. Marshal Service, New York, New York (1 page)
3. Report U.S. Marshal Service, Brooklyn, New York (1 page)

From: Salvatore Salmeri

81 AUG 18 P1:33

Attachment 2

SUBJECT: SUBP. N/A - AGENCY SUBPOENA.

1. PERSON NAMED HERBERT QUINDE, PLACE OF EMPLOYMENT: 304 W58 CAMPAIGNER PUBLICATIONS HAS NOT BEEN SERVED ON 3 ATTEMPTS BECAUSE HE WAS NOT PRESENT.

2. THE RECEPTION FOR CAMPAIGNER PUBLICATIONS IS ON 5TH FLOOR of 304 W58. IT HAS EXTREMELY MAXIMUM TYPE SECURITY, WITH THE RECEPTIONIST IN A BUBBLE TYPE LOCKED BOOTH. AS YOU ASK FOR INFO ON HERBERT QUINDE, SHE COMMUNICATES WITH YOU BY PHONE AND AFTER MAKING A IN OFFICE CALL, SHE REPLIES THAT HE IS NOT IN, NOR IS HIS SCHEDULE AVAILABLE

3. IN VIEW OF ABOVE ENDEAVORS WITHOUT SUCCESS, SERVICE AT HIS RESIDENCE 62 07-39 are suggested

WOODSIDE N.Y.

Salvatore Salmeri

5

PROCESS RECEIPT and RETURN

Use 1st copy of this form. Please print legibly, insuring readability of all copies. Do not detach any copies.

Carry Attachment 3

PLAINTIFF: FEDERAL ELECTION COMMISSION

COURT CASE NUMBER: N/A

DEFENDANT: Citizens Committee to Save Massachusetts From Ted Kennedy

TYPE OF PROCESS: Agency Subpoena - See instructions below

SERVE — NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN

Herbert Quinde

AT — ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)

62-07 39th Avenue, Woodside Queens, New York 11377

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Robert I. Bogin
Office of General Counsel
Federal Election Commission
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

- The Federal Election Commission is a government agency. Please do not bill.
- For instructions, please see attached letter to U.S. Marshal.

Signature of Attorney or other Originator requesting service on behalf of: Robert Bogin — ☒ PLAINTIFF ☐ DEFENDANT — TELEPHONE NUMBER 523-4175 — DATE 8/19/81

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 No. 53	District to Serve No. 54	Signature of Authorized USMS Deputy or Clerk	Date

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: Salvatore Salmin

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal	or	Amount of Refund (Check enclosed)

REMARKS:
8-28-81 12PM Herberto Quinde, father of subject states his son is in Europe. Subject due to return the first week in Sept 1981 left a card for him to contact our office upon his return RBI
9-9-81 NO ONE AT HOME SS
9-14-81 SAT 10 AM ~~[illegible]~~ Serve at 304 W 58 St NYC 5th floor RBI
9-5-81 Not in, no info avail. SS 10-5-81 5th floor #47
People on 5th floor will not supply any useful info. SS

1. CLERK OF THE COURT

FORM USM-285 (Rev. 11/11/77)

81 JUL 17 P12:41
UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

REPLY TO ATTN OF: from Wm. Baldwin Deputy

SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:07

Received Agency Subpoena on July 7, 1981
7-7-81 to 118 Beaumont Street Dorchester residence for Herbert Quinde, no one home in apt #1, spoke to woman on top floor Identified, gave discription of person living on first floor later turned out to be Michael Gelber, living with Quinde. Returned later in day to subjects house waited Two hours no one came home in whole house,3 decker.
7-8-81 Arrived 118 Beaumonn St. Dorchester 8 AM. Spoke to Michael Gelber (lives in same appartment with Quinde) says Quinde works for National News Service, out of town most of the time, home only once a month, Gelber was not too cooperative.
Spoke to Landlord on second floor, S Woodward says same thing Quinde moved here from New Haven with Wife,
Ran check on NCIC No record got SS# no licence revocation
To St. James Ave Boston to Social Security office try to get place of employment on Quinde.Spoke to Mr. Silverman Rm 250 in charge
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Wifes name Martha Mahoney Quinde
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OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

RECEIVED
UNITED STATES GOVERNMENT
81 JUL 17 P2:07

memorandum

GCC#5083

DATE: July 13, 1981

REPLY TO ATTN OF: James I. Hartigan
United States Marshal, District Massachusetts

SUBJECT: Agency Subpoena for HERBERT QUINDE

TO: Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel

Enclosed please find information as per our telephone conversations. If you have any further questions feel free to call me at my office, telephone number (617) 223-2851

James I. Hartigan
JAMES I. HARTIGAN
United States Marshal
District of Massachusetts

81 JUL 17 P2:07

83040414146

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: AUGUST 12, 1981

SUBJECT: MUR 1191 - Comprehensive Investigative Report #1; Received in OCS, 8-11-81, 11:35

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, August 11, 1981.

There were no objections to the report at the time of the deadline.

BEFORE THE FEDERAL ELECTION COMMISSION
August 6, 1981

SENSITIVE

In the Matter of	)	
	)	
	)	
Citizens Committee to Save Massachusetts From Ted Kennedy	)	MUR 1191 (80)

COMPREHENSIVE INVESTIGATIVE REPORT #1

On June 9, 1981, the Commission found reason to believe that the Citizens Committee to Save Massachusetts from Ted Kennedy violated sections 433 and 434 of the Federal Election Campaign Act, as amended, in connection with its distribution of two leaflets which oppose Senator Edward M. Kennedy and otherwise appear to be for the purpose of influencing federal elections.

On June 23, 1981, the Commission authorized the issuance of an Order to Answer Written Questions and approved a revised notification of findings to be served Mr. Herbert Quinde, an apparent agent of the respondent.

By letter dated June 29, 1981, the Office of General Counsel requested the assistance of Mr. James I. Hartigan, U.S. Marshal of Boston, Massachusetts, to serve the notification of findings and Order upon Mr. Herbert Quinde whose residence was identified by the New England Telephone Company in response to a subpoena issued by the Commission on July 24, 1980.

On July 17, 1981, the Office of General Counsel received a report on the attempts made by the U.S. Marshal Service to

serve the subject papers on Mr. Herbert Quinde.

Finally, the report identified Mr. Quinde as an employee of a national news service. This information led the Office of General Counsel to suggest that the U.S. Marshal Service attempt to determine if Mr. Quinde was an employee of Campaigner Publications, publisher of New Solidarity located in New York. By contacting Campaigner Publications, the U.S. Marshal Service verified that Mr. Quinde is presently employed by this publishing company.

By letter dated July 21, 1981, the Office of General Counsel requested the assistance of Mr. George Grant, U.S. Marshal for the seventh District of New York, to serve the Commission's notification of findings and order on Mr. Herbert Quinde at Campaigner Publications headquarters in New York. On August 6, 1981, this office contacted

the deputy assistant to Mr. Grant who informed us that the U.S. Marshal's office had received our request but that there was no report as yet on the service of the Commission's subpoena.

Aug 10, 1981
Date

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General

81 JUL 17 P12:41

UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

REPLY TO ATTN OF: From Wm. Baldwin Deputy

SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:01

Received Agency Subpoena on July 7, 1981
7-7-81 to 118 Beaumont Street Dorchester residence for Herbert Quinde, no one home in apt #1, spoke to woman on top floor Identified, gave discription of person living on first floor later turned out to be Michael Gelber, living with Quinde. Returned later in day to subjects house waited Two hours no one came home in whole house,3 decker.
7-8-81 Arrived 118 Beaumont St. Dorchester 8 AM. Spoke to Michael Gelber (lives in same appartment with Quinde) says Quinde works for National News Service, out of town most of the time, home only once a month, Gelber was not too cooperative.
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OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

RECEIVED
UNITED STATES GOVERNMENT
81 JUL 17

Memorandum

GCC #5083

DATE: July 13, 1981

REPLY TO ATTN OF: James I. Hartigan
United States Marshal, District Massachusetts

SUBJECT: Agency Subpoena for HERBERT QUINDE

MUR 1191

TO: Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel

Enclosed please find information as per our telephone conversations. If you have any further questions feel free to call me at my office, telephone number (617) 223-2851

James I. Hartigan

JAMES I. HARTIGAN
United States Marshal
District of Massachusetts

RECEIVED
GENERAL COUNSEL
81 JUL 17 P2:07

8304041153

81 JUL 17 P12:41

UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

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SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:07

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RECEIVED

DEPARTMENT OF JUSTICE
RETURN IN FIVE DAYS TO
OFFICE OF
UNITED STATES MARSHAL
P. O. BOX 352
BOSTON, MASS. 02101

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

POSTAGE AND FEES PAID
81 JUL 17 P12:
DEPARTMENT OF JUSTICE
JUS-431

U.S.MAR

Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

8304041455

14

81 AUG 18 P1:33
GCC#5299

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 21, 1981

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
81 AUG 18 P2:50

Herbert Quinde
Campaigner Publications
304 West 58th Street
New York, NY 10107

RE: MUR 1191

Dear Mr. Quinde:

Attached are copies of a letter and Order issued to you by the Federal Election Commission. We have made several attempts to deliver the original documents to you at your residence in Rochester, Massachusetts, however such attempts have failed. Should you require original documents, the Commission will furnish such documents upon your request.

If you have any questions, please direct them to Beverly B. Kramer at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

Copy of Letter from John Warren McGarry
dated June 29, 1981
Copy of Order to Answer Written Questions
with attached Exhibits A and B

8304041156

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June , 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

EXHIBIT B

be aware this garbage is being distributed in Boston. This is an example of what is wrong with PAC. This and the fact they are buying a government.

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] campaign spokesman in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

8304041162

From: Salvatore Salmeri

81 AUG 18 P 1:33

SUBJECT: SUBP. N/A - AGENCY SUBPOENA.

1. PERSON NAMED HERBERT QUINDE, PLACE OF EMPLOYMENT: 304 W58 CAMPAIGNER PUBLICATIONS HAS NOT BEEN SERVED ON 3 ATTEMPTS BECAUSE HE WAS NOT PRESENT.

2. THE RECEPTION FOR CAMPAIGNER PUBLICATIONS IS ON 5TH FLOOR of 304 W58. IT HAS EXTREMELY MAXIMUM TYPE SECURITY, WITH THE RECEPTIONIST IN A BUBBLE TYPE LOCKED BOOTH. AS YOU ASK FOR INFO ON HERBERT QUINDE, SHE COMMUNICATES WITH YOU BY PHONE AND AFTER MAKING A IN OFFICE CALL, SHE REPLIES THAT HE IS NOT IN, NOR IS HIS SCHEDULE AVAILABLE

3. IN VIEW OF ABOVE ENDEAVORS WITHOUT SUCCESS, SERVICE AT HIS RESIDENCE 62 07-39 ave is suggested

WOODSIDE N.Y.

Salvatore Salmeri

DESCRIPTION OF PRELIMINARY PROCEDURES FOR PROCESSING COMPLAINTS FILED WITH THE FEDERAL ELECTION COMMISSION

Complaints filed with the Federal Election Commission shall be referred to the Enforcement Division of the Office of the General Counsel, where they are assigned a MUR (Matter Under Review) number and assigned to a staff member. Within 5 days of receipt of a complaint, the Commission shall notify, in writing, any respondent listed in the complaint that the complaint has been filed and shall include with such notification a copy of the complaint. Simultaneously, the complainant shall be notified that the complaint has been received and will be acted upon. The respondent(s) shall then have 15 days to demonstrate, in writing, that no action should be taken against him/ her in response to the complaint.

At the end of the 15 days, the Office of General Counsel shall report to the Commission making a recommendation(s) based upon a preliminary legal and factual analysis of the complaint and any submission made by the respondent(s). A copy of respondent's submission shall be attached to the Office of General Counsel's report and forwarded to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act (FECA) and that the Commission will conduct an investigation of the matter; or (b) that the Commission finds no reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act (FECA) and, accordingly, that the Commission close the file on the matter.

If, by an affirmative vote of four (4) Commissioners, the Commission decides that it has reason to believe that a person has committed or is about to commit a violation of the Federal Election Campaign Act (FECA), the Office of the General Counsel shall open an investigation into the matter. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for deposition, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

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If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has occurred or may occur. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

UNITED STATES MARSHALS SERVICE
PROCESS RECEIPT and RETURN

PLAINTIFF: FEDERAL ELECTION COMMISSION	COURT CASE NUMBER: N/A
DEFENDANT: Citizens Committee to Save Massachusetts From Ted Kennedy	TYPE OF PROCESS: Agency Subpoena - See instructions Policy

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN: Herbert Quinde 247-8828

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code): Campaigner Publications 304 W. 58th St., New York, NY 10019

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Beverly B. Kramer
Office of General Counsel
Federal Election Commission
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

- The Federal Election Commission is a government agency. Please do not bill.
- For instructions, please see attached letter to U.S. Marshals.

Signature of Attorney or other Originator requesting service on behalf of: [X] PLAINTIFF [ ] DEFENDANT | TELEPHONE NUMBER (202) 523-4529 | DATE 7/20/81

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 No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date

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 8-21-81 | Time am pm

Signature of U.S. Marshal or Deputy: Salvatore Salamini

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund

REMARKS:

7/29/81 (E) 7 fth floor receptionist said no one avail try later

7/29/81 (E) GEORGE CANNING - Legal aide stated Herbert Quinde only works intermittently at Campaigner Publ. note left to call SDNY SS

SW 4-30 (E) 8-10-81 5 pl he is not in SS. Could not obtain any answer as to when he is in

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 6/15/79)

#123

8304041467

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 21, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Grant, U.S. Marshal
114 U.S. Courthouse Annex
One St. Andrews Plaza
New York, NY 10007

Re: MUR 1191 (80)

Dear Mr. Grant:

We are requesting the assistance of your office in serving the enclosed order and letters to Mr. Herbert Quinde, 304 West 58th Street, New York, New York (Campaigner Publications headquarters). The referenced address is Mr. Quinde's office address. The corresponding telephone number is (212)247-8820.

Under 2 U.S.C. § 437d(a)(1), the Commission is empowered to require, by special or general orders, any person to submit in writing such reports and answers to questions as the Commission may proscribe. Ordinarily, these orders are forwarded by certified mail. In this instance, our correspondence addressed to Mr. Quinde has returned unclaimed. Furthermore, efforts to serve papers upon Mr. Quinde at his home address through the U.S. Marshal service in Boston have failed (See attached report from Mr. James Hartigan, U.S. Marshal).

In connection with this matter, you should be aware that 2 U.S.C. § 437g(a)(12)(A) prohibits any person from making public the fact of any "notification or investigation" by the Commission until the person complained against agrees in writing to make public the investigation.

Please send your return on the service to the Federal Election Commission, Attn: Beverly B. Kramer, Office of General Counsel, 1325 K Street, N.W., Washington, D.C. 20463. If you have any questions, please contact Beverly Kramer at (202) 523-4529.

Thank you for your assistance.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General

Enclosures

Form 285
Report of James Hartigan
Letters to Mr. Herbert Quinde
Order to Answer Written Questions

81 JUL 17 PM 2:41

UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

REPLY TO ATTN OF: From Wm. Baldwin Deputy

SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:01

Received Agency Subpoena on July 7, 1981
7-7-81 to 118 Beaumont Street Dorchester residence for Herbert Quinde, no one home in apt #1, spoke to woman on top floor Identified, gave discription of person living on first floor later turned out to be Michael Gelber, living with Quinde. Returned later in day to subjects house waited Two hours no one came home in whole house, 3 decker.
7-8-81 Arrived 118 Beaumonn St. Dorchester 8 AM. Spoke to Michael Gelber (lives in same appartment with Quinde) says Quinde works for National News Service, out of town most of the time, home only once a month, Gelber was not too cooperative.
Spoke to Landlord on second floor, S Woodward says same thing Quinde moved here from New Haven with Wife,
Ran check on NCIC No record got SS# no licence revocation
To St. James Ave Boston to Social Security office try to get place of employment on Quinde. Spoke to Mr. Silverman Rm 250 in charge
Checked News Services to see if Quinde worked for any of them
Checked AP, UPI, Reuters, Patriot Ledger, Boston Globe, checked with news people in Bldg. not known.
Wifes name Martha Mahoney Quinde
7-9-81 to 118 Beaumont St. Dorchester no one home
to Police Dept Fields Corner No knowledge of Quinde here
to 600 Washington St. Boston Polk Directory people nothing in their records of Quindy.
to Boston City Hall check voting list for 118 Beaumont St. Dorchester Quinde not listed but Martha Mahoney listed this was as of 1980)

Called 436 1698 Tel. # on leaflet (Exhib A) and found it to be an unpublished private residents #. In 1978 this Tel. # was listed to Mrs. Jeanette F. Egan, Wid. Opr. for New Eng. Tel. and Tel. 9 ODonnell Ter. Dorchester. checked with directory no such person in tel book.

Kramer

RECEIVED

UNITED STATES GOVERNMENT

81 JUL 17 P2:07

memorandum

GCC#5083

DATE: July 13, 1981

REPLY TO ATTN OF: James I. Hartigan
United States Marshal, District Massachusetts

SUBJECT: Agency Subpoena for HERBERT QUINDE

TO: Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel

Enclosed please find information as per our telephone conversations. If you have any further questions feel free to call me at my office, telephone number (617) 223-2851

James I. Hartigan

JAMES I. HARTIGAN
United States Marshal
District of Massachusetts

81 JUL 17 P2:07

8304041471

legibility of all copies. Do not detach any copies.

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	N/A
DEFENDANT	**TYPE OF PROCESS**
Citizens Committee to Save Massachusetts From Ted Kennedy	Agency Subpoena - See instructions below

SERVE NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN

Herbert Quinde

AT ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)

62-07 39th Avenue, Woodside Queens, New York 11377

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Robert I. Bogin
Office of General Counsel
Federal Election Commission
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

- The Federal Election Commission is a government agency. Please do not bill.
- For instructions, please see attached letter to U.S. Marshal.

Signature of Attorney or other Originator requesting service on behalf of: Robert Bogin ☒ PLAINTIFF ☐ DEFENDANT | TELEPHONE NUMBER 523-4175 | DATE 8/19/81

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 No. 53	District to Serve No. 54	Signature of Authorized USMS Deputy or Clerk	Date

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., 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: Salvatore Salmini

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund (Check enclosed)

REMARKS:
8-28-81 12PM Herberto Quinde, father of subject states his son is in Europe. Subject due to return the first week in Sept 1981 I left a card for him to contact our office upon his return RBB
9-9-81 NO ONE AT HOME JA
9-19-81 SAT 10 AM ~~[illegible]~~ Serve at 304 W 58 St NYC 5th floor RBB
10-5-81 Not in, no info avail. SS 10-5-81 5th floor #47

PRIOR EDITIONS MAY BE USED | 1. CLERK OF THE COURT | FORM USM-285 (Rev. 11/11/77)

People on 5th floor would not supply any useful info. SS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
'81 OCT 30 P3:33

Herbert Quinde
62-07 39th Avenue
Woodside, N.Y. 11377

RE: MUR 1191

Dear Mr. Quinde:

Attached are copies of a letter and Order issued to you by the Federal Election Commission. We have made several attempts to deliver the original documents to you at your residence in Dorchester, Massachusetts, however such attempts have failed. Should you require original documents, the Commission will furnish such documents upon your request.

If you have any questions, please direct them to Robert I. Bogin at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

Copy of Letter from John Warren McGarry
dated June 29, 1981
Copy of Order to Answer Written Questions
with attached Exhibits A and B

8304041174

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June, 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?
BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

EXHIBIT B

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

8304041460

0 3 0 4 0 1 1 4 1 8 1

U. S. DEPARTMENT OF JUSTICE
UNITED STATES MARSHAL
SOUTHERN DISTRICT OF NEW YORK
U. S. COURTHOUSE ANNEX
ONE ST. ANDREWS PLAZA
NEW YORK, NEW YORK 10007

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

[redacted]
U. S. [redacted]
Jun 01

please forward

[redacted]
~~Federal Election Commission~~
~~1325 K Street, N. W.~~
~~Washington, D. C. 20463~~
[redacted]

Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Wash. D.C. 20463

13018

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis J. Soscia, U.S. Marshal
225 Cadman Plaza East
Brooklyn, N.Y. 11201

RE: MUR 1191 (80)

Dear Mr. Soscia:

We are requesting the assistance of your office in serving the enclosed order and letters on Mr. Herbert Quinde, 62-07 39th Avenue, Woodside Queens, New York. The referenced address is Mr. Quinde's personal residence.

Under 2 U.S.C. § 437d(a)(1), the Commission is empowered to require, by special or general orders, any person to submit in writing such reports and answers to questions as the Commission may proscribe. Ordinarily, these orders are forwarded by certified mail. In this instance, our correspondence addressed to Mr. Quinde has returned unclaimed. Furthermore, efforts to serve papers upon Mr. Quinde at his home address through the U.S. Marshal service in Boston have failed (See attached report from Mr. James Hartigan, U.S. Marshal).

In connection with this matter, you should be aware that 2 U.S.C. § 437g(a)(12)(A) prohibits any person from making public the fact of any "notification or investigation" by the Commission until the person complained against agrees in writing to make public the investigation.

Please send your return on the service to the Federal Election Commission, Attn: Robert I. Bogin, Office of General Counsel, 1325 K Street, N.W., Washington, D.C. 20463. If you have any questions, please contact Robert Bogin at (202) 523-4175.

Thank you for your assistance.

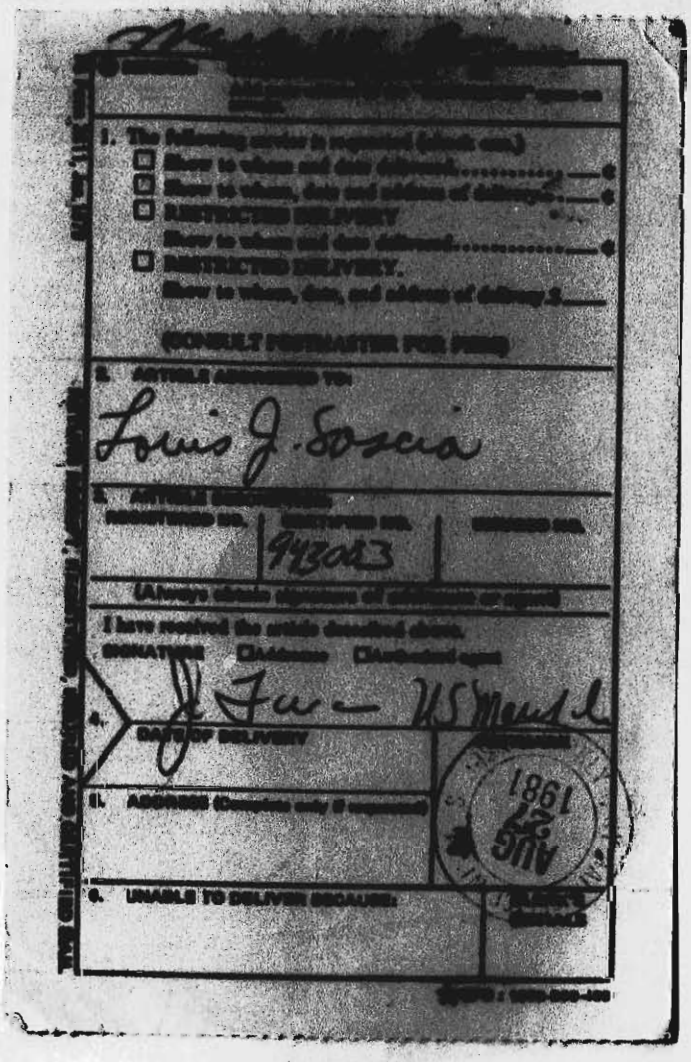
Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

Form 285
Report of James Hartigan
Letters to Mr. Herbert Quinde
Order to Answer Written Questions



U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETURN

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of this last (5th) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF: FEDERAL ELECTION COMMISSION	COURT CASE NUMBER: N/A
DEFENDANT: Citizens Committee to Save Massachusetts From Ted Kennedy	TYPE OF PROCESS: Agency Subpoena - See instructions below

SERVE NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Herbert Quinde

AT ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
62-07 39th Avenue, Woodside Queens, New York 11377

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Robert I. Bogin
Office of General Counsel
Federal Election Commission
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

- The Federal Election Commission is a government agency. Please do not bill.
- For instructions, please see attached letter to U.S. Marshal.

Signature of Attorney or other Originator requesting service on behalf of: Robert Bogin ☒ PLAINTIFF ☐ DEFENDANT | TELEPHONE NUMBER 523-4175 | DATE 8/19/81

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 No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date

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 or	Amount of Refund (Check enclosed)

REMARKS:

8304041186

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 11/11/77)

81 JUL 17 P12:41

UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

REPLY TO ATTN OF: From Wm. Baldwin Deputy

SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:07

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Spoke to Landlord on second floor, S Woodward says same thing Quinde moved here from New Haven with Wife,
Ran check on NCIC No record got SS# no licence revocation
To St. James Ave Boston to Social Security office try to get place of employment on Quinde. Spoke to Mr. Silverman Rm 250 in charge Checked News Services to see if Quinde worked for any of them Checked AP, UPI, Reuters, Patriot Ledger, Boston Globe, checked with news people in Bldg. not known.
Wifes name Martha Mahoney Quinde
7-9-81 to 118 Beaumont St. Dorchester no one home
to Police Dept Fields Corner No knowledge of Quinde here
to 600 Washington St. Boston Polk Directory people nothing in their records of Quindy.
to Boston City Hall check voting list for 118 Beaumont St. Dorchester Quinde not listed but Martha Mahoney listed this was as of 1980

Called 436 1698 Tel. # on leaflet (Exhib A) and found it to be an unpublished private residents #. In 1978 this Tel. # was listed to Mrs. Jeanette F. Egan, Wid. Opr. for New Eng. Tel. and Tel. 9 ODonnell Ter. Dorchester. checked with directory no such person in tel book.

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

RECEIVED
81 JUL 17 P2:07

UNITED STATES GOVERNMENT

memorandum

GCC#5083

DATE: July 13, 1981

REPLY TO ATTN OF: James I. Hartigan
United States Marshal, District Massachusetts

SUBJECT: Agency Subpoena for HERBERT QUINDE

TO: Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel

Enclosed please find information as per our telephone conversations. If you have any further questions feel free to call me at my office, telephone number (617) 223-2851

James I. Hartigan

JAMES I. HARTIGAN
United States Marshal
District of Massachusetts

81 JUL 17 P2:07

8304041488

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Herbert Quinde
62-07 39th Avenue
Woodside, N.Y. 11377

RE: MUR 1191

Dear Mr. Quinde:

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If you have any questions, please direct them to Robert I. Bogin at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

Copy of Letter from John Warren McGarry
dated June 29, 1981
Copy of Order to Answer Written Questions
with attached Exhibits A and B

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

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Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June, 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 21, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Grant, U.S. Marshal
114 U.S. Courthouse Annex
One St. Andrews Plaza
New York, NY 10007

Re: MUR 1191 (80)

Dear Mr. Grant:

We are requesting the assistance of your office in serving the enclosed order and letters to Mr. Herbert Quinde, 304 West 58th Street, New York, New York (Campaigner Publications headquarters). The referenced address is Mr. Quinde's office address. The corresponding telephone number is (212)247-8820.

Under 2 U.S.C. § 437d(a)(1), the Commission is empowered to require, by special or general orders, any person to submit in writing such reports and answers to questions as the Commission may proscribe. Ordinarily, these orders are forwarded by certified mail. In this instance, our correspondence addressed to Mr. Quinde has returned unclaimed. Furthermore, efforts to serve papers upon Mr. Quinde at his home address through the U.S. Marshal service in Boston have failed (See attached report from Mr. James Hartigan, U.S. Marshal).

In connection with this matter, you should be aware that 2 U.S.C. § 437g(a)(12)(A) prohibits any person from making public the fact of any "notification or investigation" by the Commission until the person complained against agrees in writing to make public the investigation.

Please send your return on the service to the Federal Election Commission, Attn: Beverly B. Kramer, Office of General Counsel, 1325 K Street, N.W., Washington, D.C. 20463. If you have any questions, please contact Beverly Kramer at (202) 523-4529.

Thank you for your assistance.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General

Enclosures

Form 285
Report of James Hartigan
Letters to Mr. Herbert Quinde
Order to Answer Written Questions

U.S. Department of Justice
UNITED STATES MARSHALS SERVICE
PROCESS RECEIPT and RETURN

PROCESS BY THE U.S. MARSHAL is the issuance of the last file. If copy of this form. Please [illegible] legibly, including readability of all copies. [illegible] check any copies.

PLAINTIFF: FEDERAL ELECTION COMMISSION	COURT CASE NUMBER: N/A
DEFENDANT: Citizens Committee to Save Massachusetts From Ted Kennedy	TYPE OF PROCESS: Agency Subpoena - See instructions below

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Herbert Quinde

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
Campaigner Publications 304 W. 58th St., New York, NY 10107

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Beverly B. Kramer
Office of General Counsel
Federal Election Commission
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

- The Federal Election Commission is a government agency. Please do not bill.
- For instructions, please see attached letter to U.S. Marshall

Signature of Attorney or other Originator requesting service on behalf of: ☒ PLAINTIFF ☐ DEFENDANT | TELEPHONE NUMBER: (202) 523-4529 | DATE: 7/20/91

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 No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date

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 or	Amount of Refund

REMARKS:

8304041998

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 6/15/79)

RECEIVED
UNITED STATES GOVERNMENT
81 JUL 17 P2:07

memorandum

GCC#5083

DATE: July 13, 1981

REPLY TO ATTN OF: James I. Hartigan
United States Marshal, District Massachusetts

SUBJECT: Agency Subpoena for HERBERT QUINDE

TO: Federal Election Commission
Attn: Beverly B. Kramer
Office of General Counsel

Enclosed please find information as per our telephone conversations. If you have any further questions feel free to call me at my office, telephone number (617) 223-2851

James I. Hartigan

JAMES I. HARTIGAN
United States Marshal
District of Massachusetts

81 JUL 17 P2:07

83040414199

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

1191

81 JUL 17 PM 2:41

UNITED STATES GOVERNMENT

memorandum

DATE: July 10, 1981

REPLY TO ATTN OF: From Wm. Baldwin Deputy

SUBJECT: Agency Subpoena for Herbeft Quinde

TO: James Hartigan U.S. Marshal

81 JUL 17 P2:01

Received Agency Subpoena on July 7, 1981
7-7-81 to 118 Beaumont Street Dorchester residence for Herbert Quinde, no one home in apt #1, spoke to woman on top floor Identified, gave discription of person living on first floor later turned out to be Michael Gelber, living with Quinde. Returned later in day to subjects house waited Two hours no one came home in whole house,3 decker.
7-8-81 Arrived 118 Beaumont St. Dorchester 8 AM. Spoke to Michael Gelber (lives in same appartment with Quinde) says Quinde works for National News Service, out of town most of the time, home only once a month, Gelber was not too cooperative.
Spoke to Landlord on second floor, S Woodward says same thing Quinde moved here from New Haven with Wife,
Ran check on NCIC No record got SS# no licence revocation
To St. James Ave Boston to Social Security office try to get place of employment on Quinde.Spoke to Mr. Silverman Rm 250 in charge Checked News Services to see if Quinde worked for any of them Checked AP, UPI, Reuters, Patriot Ledger, Boston Globe,checked with news people in Bldg. not known.
Wifes name Martha Mahoney Quinde
7-9-81 to 118 Beaumont St. Dorchester no one home
to Police Dept Fields Corner No knowledge of Quinde here
to 600 Washington St. Boston Polk Directory people nothing in their records of Quindy.
to Boston City Hall check voting list for 118 Beaumont St. Dorchester Quinde not listed but Martha Mahoney listed this was as of 1980

8304041420 0

Came to Boston in 75, lived in Brighton, worked with National Caucaus of Labor Committee.
Called 436 1698 Tel. # on leaflet (Exhib A) and found it to be an unpublished private residents #. In 1978 this Tel. # was listed to Mrs. Jeanette F. Egan, Wid. Opr. for New Eng. Tel. and Tel. 9 ODonnell Ter. Dorchester. checked with directory no such person in tel book.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 21, 1981

Herbert Quinde
Campaigner Publications
304 West 58th Street
New York, NY 10107

RE: MUR 1191

Dear Mr. Quinde:

Attached are copies of a letter and Order issued to you by the Federal Election Commission. We have made several attempts to deliver the original documents to you at your residence in Rochester, Massachusetts, however such attempts have failed. Should you require original documents, the Commission will furnish such documents upon your request.

If you have any questions, please direct them to Beverly B. Kramer at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

Copy of Letter from John Warren McGarry
dated June 29, 1981
Copy of Order to Answer Written Questions
with attached Exhibits A and B

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June, 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

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HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

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EXHIBIT B

is being distributed . bottom. This is an example of what wrong with the This is and the that they are buying o[illegible]

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Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] campaign spokesman in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

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Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

8304041420 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James I. Hartigan
U.S. Marshal
Civil Section
McCormack Post Office and Courthouse
Boston, Massachusetts 02109

Re: MUR 1191 (80)

Dear Mr. Hartigan:

We are requesting the assistance of your office in serving the enclosed letter and order upon Mr. Herbert Quinde, 118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts.

Under 2 U.S.C. § 437d(a)(1), the Commission is empowered to require, by special or general orders, any person to submit in writing such reports or questions as the Commission may proscribe. Ordinarily, these orders are forwarded by certified mail. In this instance, our correspondence addressed to Mr. Quinde has returned unclaimed.

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Please send your return on the service to the Federal Election Commission, Attn: Beverly B. Kramer, Office of General Counsel, 1325 K Street, N.W., Washington, D.C. 20463. If you have any questions, please contact Beverly Kramer at (202)523-4529.

Thank you for your assistance.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Letter to Mr. Herbert Quinde
Order to Answer Written Questions
Form 285

6/29/81

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

IMPORTANT: (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:

   Mr. James Hartigan

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438466	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

W. Stokes

4. DATE OF DELIVERY

JUL 7 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

BOSTON, MASSACHUSETTS JUL 8 1981 U.S. POSTAGE

STAMP

MUR 1191 OGC B. Kramer

8304041420 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James I. Hartigan
U.S. Marshal
Civil Section
McCormack Post Office and Courthouse
Boston, Massachusetts 02109

Re: MUR 1191 (80)

Dear Mr. Hartigan:

We are requesting the assistance of your office in serving the enclosed letter and order upon Mr. Herbert Quinde, 118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts.

Under 2 U.S.C. § 437d(a)(1), the Commission is empowered to require, by special or general orders, any person to submit in writing such reports or questions as the Commission may proscribe. Ordinarily, these orders are forwarded by certified mail. In this instance, our correspondence addressed to Mr. Quinde has returned unclaimed.

In connection with this matter, you should be aware that 2 U.S.C. § 437g(a)(12)(A) prohibits any person from making public the fact of any "notification or investigation" by the Commission until the person complained against agrees in writing to make public the investigation.

Please send your return on the service to the Federal Election Commission, Attn: Beverly B. Kramer, Office of General Counsel, 1325 K Street, N.W., Washington, D.C. 20463. If you have any questions, please contact Beverly Kramer at (202)523-4529.

Thank you for your assistance.

Sincerely,

Charles N. Steele
General Counsel

Prepared by: Beverly Kramer 6/18/81
Typed by: Beverly Kramer 6/18/81

8304041421 0

U. S. Department of Justice
UNITED STATES MARSHALS SERVICE
PROCESS RECEIPT and RETURN

PLEASE ENTER THE U.S. MARSHAL" as the name of the [illegible] or print legibly. Indicate [illegible] of all copies. Do not detach any copies.

PLAINTIFF: FEDERAL ELECTION COMMISSION	COURT CASE NUMBER: N/A
DEFENDANT: Citizens Committee to Save Massachusetts From Ted Kennedy	TYPE OF PROCESS: Agency Subpoena *

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Herbert Quinde

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

Beverly B. Kramer
Office of General Counsel
Federal Election Commission
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

Phone number : (617) 436-4698

- The Federal Election Commission is a government agency. Please do not bill.
- * See attached letter to U.S. Marshal

Signature of Attorney or other Originator requesting service on behalf of:	☒ PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
Beverly B. Kramer		(202) 523-4529	6/26/81

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 No.	District to Serve No.	Signature of Authorized USMS Deputy or Clerk	Date

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 or	Amount of Refund

REMARKS:

PRIOR EDITIONS MAY BE USED

1. CLERK OF THE COURT

FORM USM-285 (Rev. 6/15/79)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1981

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In the absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy, 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosure
Order to Answer Written Questions
Procedures

[redacted]

[redacted]

If you have any questions, please contact Brenda [redacted] at the address below, or call [redacted]

[redacted]

Enclosure
Letter to Author Matthew Shepard
Stipulations

BRKsamoriano 6/15/81
FAGross

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position and duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy)?

3) How many of the leaflets were distributed?

4) By whom were the leaflets distributed?

5) How were the leaflets distributed?

6) On what date(s) were the leaflets distributed?

7) To whom were the leaflets distributed?

8) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the acount is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 25th day of June , 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

be aware this garbage is being distributed. Boston. This is an example of what's wrong with PAC. This and the fact they are buying or [illegible]

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE MWE

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: JUNE 25, 1981

SUBJECT: ORDER REGARDING MUR 1191

The attached order regarding MUR 1191, which was approved by the Commission on June 24, 1981 by a vote of 6-0, has been signed and sealed this date.

Attachment:
Order

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1191
Citizens Committee to Save Massachusetts from Ted Kennedy	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 23, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1191:

1. Authorize the issuance of the Order to Answer Written Questions as submitted with the General Counsel's June 19, 1981 memorandum.

2. Approve the letter with enclosed Order to be served Mr. Herbert Quinde (Attachment to the General Counsel's memorandum dated June 19, 1981).

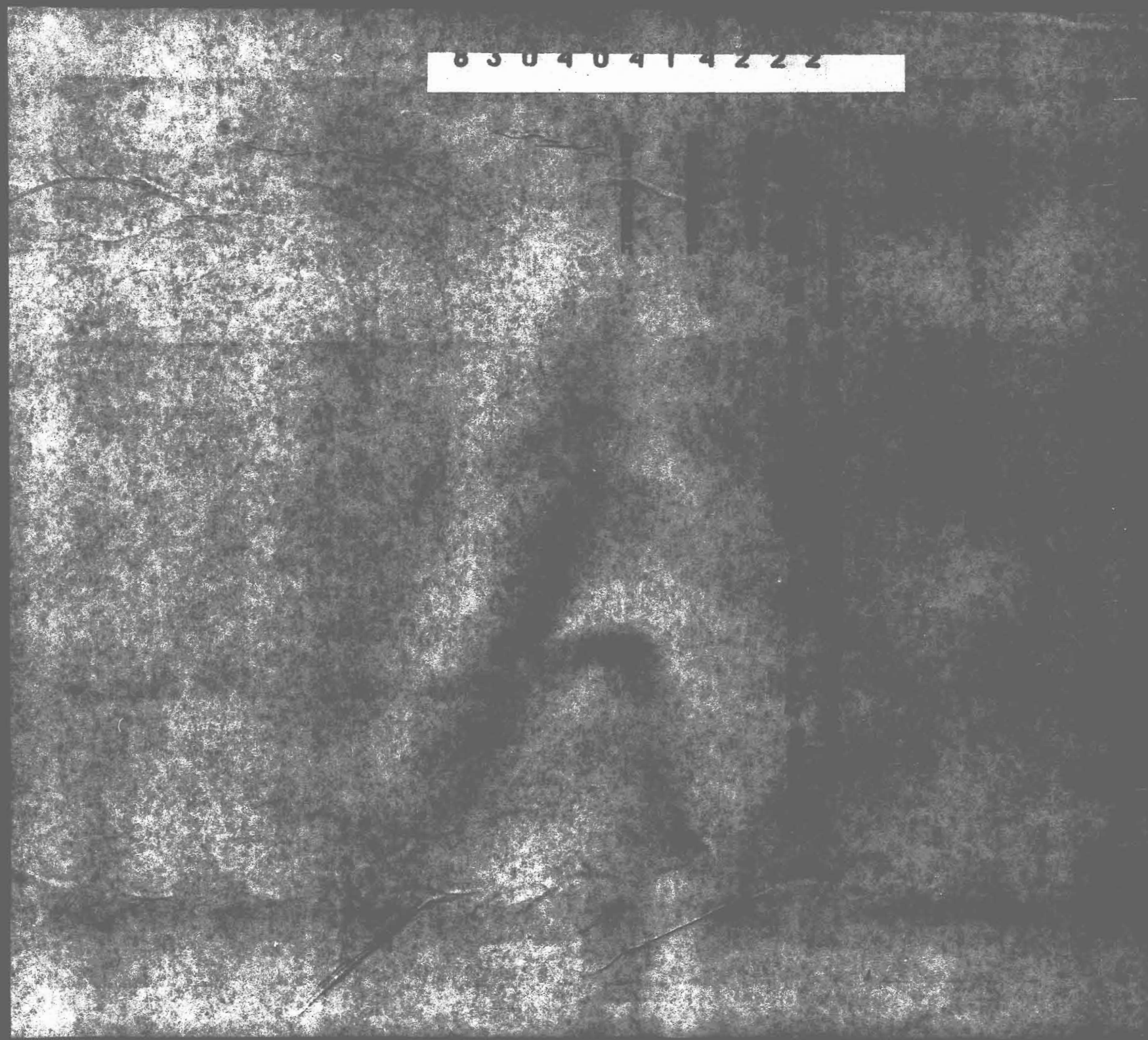
Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter,

Attest:

6/24/81
Date

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

Received in Office of the Commission Secretary: 6-19-81, 4:12
Circulated on 48 hour vote basis: 6-22-91, 11:00


8304041422 2

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1191 - Request for Authorization to Issue Order

In the Executive Session of June 9, 1981, the Commission directed the Office of General Counsel to revise its letter and questions issued to Mr. Herbert Quinde, agent of respondent committee in MUR 1191.

Per this request, the Office of General Counsel has prepared the attached letter and Order to answer written questions. We recommend that the Commission approve the referenced letter and authorize the issuance of the Order attached thereto.

Recommendation

1) Authorize the issuance of the attached Order to Answer Written Questions.

2) Approve the attached letter with enclosed Order to be served Mr. Herbert Quinde.

Attachments
Authorization form
Order to Answer Written Questions
Letter to Herbert Quinde

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance of an order to the following person in connection with MUR 1191 (80):

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Vernon Thomson
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

8 3 0 4 0 4 1 4 2 2 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 9, 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed order which is issued to you by the Federal Election Commission. Your response must be submitted within 10 days of your receipt of the order.

In absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy 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 have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

Enclosure
Order to Answer Written Questions
Procedures

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Herbert Quinde is hereby ordered to reply to the following questions. Question regarding "the leaflets" refer to undated communications attached hereto and marked Exhibits "A" and "B".

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9) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

Please submit responses to the above questions within ten (10) days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of , 1981.

John Warren McGarry, Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

EXHIBIT "A"

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

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EXHIBIT "B"

Right you should be aware this garbage is being distributed Boston. This is example of what wrong with the this and the fact they are buying power.

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

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Ted and Rose Kennedy

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Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

8304041425 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
Citizens Committee to Save Massachusetts from Ted Kennedy	MUR 1191

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on June 9, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1191:

1. Find Reason to Believe that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. §433.

2. Find Reason to Believe that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. §434.

3. Direct the Office of General Counsel to revise the letter with questions attached to the General Counsel's May 29, 1981 report in this matter and circulate the revised document for Commission approval.

Attest:

6/12/81
Date

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS /JODY CUSTER JC
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: JUNE 2, 1981

SUBJECT: ADDITIONAL OBJECTION - MUR 1191 General Counsel's Report, dated 5-29-81; Received in OCS, 6-1-81, 10:53

You were notified previously of an objection by Commissioner Reiche.

Commissioner Harris submitted an additional objection at 2:36, June 2, 1981.

This matter will be discussed in executive session on Tuesday, June 9, 1981.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MWE

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JUNE 2, 1981

SUBJECT: OBJECTION - MUR 1191 General Counsel's Report, dated May 29, 1981; Received in OCS, 6-1-81, 10:53

The above-named document was circulated on a 48 hour vote basis at 4:00, June 1, 1981.

Commissioner Reiche submitted an objection at 10:58, June 2, 1981.

This matter will be placed on the Executive Session Agenda for Tuesday, June 9, 1981. A copy of Commissioner Reiche's vote sheet with comments is attached.

Attachment:
Vote sheet

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1191
Citizens Committee to Save)
Massachusetts from Ted Kennedy)

GENERAL COUNSEL'S REPORT

I. Background

On March 19, 1980, the Kennedy for President Committee filed a complaint with the Federal Election Commission alleging that the Citizens Committee to Save Massachusetts from Ted Kennedy (also know as Citizens to Protect Massachusetts from Ted Kennedy) (herein, the "respondent") violated certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the distribution of leaflets which the complainant claims "expressly advocates the defeat of Edward M. Kennedy and otherwise seeks to influence the Presidential nomination." Specifically, the complainant alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy has failed to:

1) file a statement of organization with the Commission in accordance with 2 U.S.C. § 433;

2) file reports with the Commission in accordance with 2 U.S.C. § 434; and

3) include a notice on communications in accordance with 2 U.S.C. § 441d.

On June 23, 1980, the Office of General Counsel informed the Commission of its unsuccessful attempts to notify the respondent of the complaint pursuant to 2 U.S.C. § 437g(a)(1). The only information available for determining the whereabouts

of the respondent was a telephone number appearing in the complainant's exhibits (i.e., leaflets).

On July 1, 1980, the Commission directed that this matter be referred back to the Office of General Counsel for the purpose of further investigation. Pursuant to the Commission's recommendation, the Office of General Counsel sent an Order to Answer Written Questions to the general security manager of the New England Telephone Company. The order requested that the general security manager supply the name and address of the individual(s) subscribing to their services and having an account for the questioned telephone number from January 1, 1979 to the present.

On August 4, 1980, the New England Telephone Company revealed that Mr. Herbert Quinde, residing at 118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts, established an account for the questioned telephone number in August of 1979. On August 6, 1980, the Office of General Counsel sent notification of the complaint to Mr. Quinde by certified mail. On September 4, 1980 the notification was returned unclaimed.

On September 5, 1980, the Office of General Counsel sent notification of the complaint by first class mail to Mr. Herbert Quinde. To date we have received no response nor postal return.

In view of the fact that the complaint filed by the Kennedy for President Committee meets the technical require-

ments of 11 C.F.R. § 111.4 and that the Commission has rendered the respondent the requisite fifteen days in which to respond to the notification of the complaint pursuant to 2 U.S.C. § 437g(a), the General Counsel's Office will proceed to an analysis of the legal and factual merits of the case.

II. Factual Basis and Legal Analysis

The General Counsel's review of this complaint reveals that certain fundamental facts of this case must be further developed. Final detemmations on the merits of alleged violations appear inextricably tied to questions regarding the date upon which the exhibited leaflets were distributed, the costs in connection with their distribution and the nature of the organization to which the leaflets are attributed. This information is not available upon the face of exhibits nor has it been supplied by the complainant.

The complainant hinges its allegation as to FECA violations on its assumption that the exhibited leaflets expressly advocate the defeat of Senator Edward M. Kennedy. However, regardless of whether the communications expressly advocate the defeat of Edward Kennedy, they do appear to be for the purpose of influencing a federal election. As such, there is reason to believe that the respondent violated 2 U.S.C. §§ 433 and 434 for failure to register as a political committee and for failure to file disclosure reports.

A. Alleged Violations of 2 U.S.C. § 433 and § 434

2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year."

2 U.S.C. § 433 requires all committees to file a statement of organization within ten (10) days after becoming a political committee within the meaning of § 431(4).

2 U.S.C. § 431(9)(A) defines "expenditure" as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing an election for Federal office."

2 U.S.C. § 434 requires the treasurer of a political committee to file reports of receipts and expenditures in accordance with the provisions therein.

Based upon a review of documentation presented by the complainant in this matter, the facts of this case are as follows. The Citizens Committee to Save Massachusetts from Ted Kennedy (AKA Citizens to Protect Massachusetts from Ted Kennedy), a self-proclaimed "nonpartisan coalition of city workers, ethnic minorities, labor unions and

businessmen", may have distributed two leaflets (see Exhibits "A" and "B").

The leaflets attributed to the Citizens Committee to Save Massachusetts from Ted Kennedy have as their single subject Senator Edward M. Kennedy. The dates upon which the leaflets were distributed are unknown. Furthermore, the party or parties responsible for their distribution have not been fully identified. Without such information, it is difficult to weigh the merits of the alleged violations of 2 U.S.C. § 433 and § 434.

If the questioned communications were distributed during the period of intense political activity surrounding the Democratic nomination process or subsequent to a declaration of candidacy, it would appear that such communications, which criticize the Senator's conduct, may have been designed to influence the Presidential nomination. If costs incurred in the printing and distribution of the communications are found to exceed $1,000, the Commission may find cause to pursue the complainant's allegation that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 for failure to register as a political committee and to report expenditures made in connection with the distribution of leaflets which seek to influence a federal election. 1/

1/ In the context of MUR 1192 (open), the Commission determined that a corporation, having paid the costs in connection with the distribution of communications which opposed Senator Kennedy's legislative policies, violated 2 U.S.C. § 441b by making expenditures in connection with federal elections.

For purposes of developing the facts in this case, the Office of General Counsel recommends that the Commission find reason to believe that Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 and send questions to the respondent.

B. Alleged Violation of 2 U.S.C. § 441d

2 U.S.C. § 441d(a) requires that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication, if not authorized by a candidate, an authorized political committee of a candidate, or its agents, must clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee. 2/

The term "independent expenditure" is defined by 2 U.S.C. § 431(7) as an expenditure by a person expressly

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2/ If the Commission determines to find reason to believe that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 441d, it follows that the Commission must also find reason to believe the respondent violated 2 U.S.C. § 434(c) by failing to file a statement containing information relevant to the making of an independent expenditure, unless the Committee is also found to be a political committee.

advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of any candidate, or any authorized committee or agent of such candidate. For purpose of this definition --

1) "Expressly advocating" means "any communication containing a message advocating election or defeat, including but not limited to the 'vote for', 'elect', 'support', 'cast your ballot for', and 'Smith for Congress', or 'vote against', 'defeat', or 'reject'." 11 C.F.R. § 109.1(b)(3).

2) "Clearly identified candidate" means "that the name of the candidate appears, a photograph of drawing of the candidate appears, or the identity of the candidate is otherwise apparent by unambiguous reference." 11 C.F.R. § 109.1(b)(3).

The complainant alleges that the Citizens Committee to Save Massachusetts From Ted Kennedy distributed two leaflets which expressly advocate the defeat of Senator Edward M. Kennedy in his bid for the Presidential nomination. Since the leaflets do not include a notice stating the name of the person who paid for the communication and that

the communication was not authorized by the candidate or candidate's committee, the complainant alleges that the Citizens Committee to Save Massachusetts From Ted Kennedy violated 2 U.S.C. § 441d. The Office of General Counsel has carefully reviewed the leaflets attached hereto as Exhibits "A" and "B". Based on this review, the General Counsel's factual and legal analysis follows.

The two leaflets in question make unambiguous reference to Edward M. Kennedy (including a caricature and photograph) and set forth Senator Edward M. Kennedy's position with respect to certain health issues. In addition, the leaflets comment upon Senator Kennedy's personal conduct and the conduct of his family members. The respondent's stand against the positions taken by Senator Kennedy is made clear by commentaries. However, nowhere on the face of the leaflets do there appear any words of express advocacy for the defeat of Edward M. Kennedy in the presidential election nor is any reference made to any political opponent of Senator Kennedy. Further, in Exhibit B, no reference whatsoever is made to any federal election or political affiliation of Senator Kennedy.

Because the Commission's investigation can proceed to a fuller development of the facts of the case based on the findings of violations of § 433 and § 434 as recommended, the Office of General Counsel recommends that the Commission

make no finding at this time as to whether the leaflets in question reach the level of "express advocacy" as defined by the statute and by the Commission's Regulations. See also Buckley v. Valeo, 424 U.S. 1, 78-80 (1976) and FEC v. Central Long Island Tax Reform, 616 F.2d 45, 52, 53, (2d Cir., 1980).

Recommendations

1. Find reason to believe that the Citizens Committee to Save Massachusets from Ted Kennedy violated 2 U.S.C. § 433.

2. Find reason to believe that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 434.

3. Approve and send the attached letter with questions.

29 May 1981
Date

Charles N. Steele
General Counsel

Enclosures

Exhibit "A"
Exhibit "B"
Letter to Herbert Quinde with attached First Questions

IS YOUR CHILD A DOPE ADDICT?

BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

EXHIBIT "B"

ugh! you should be aware this garbage is being distributed in Boston. This is an example of what's wrong with the this and that. They are buying on [illegible]

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] campaign spokesman in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

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Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8 3 0 4 0 4 1 4 2 4 8

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

RE: MUR 1191

Dear Mr. Quinde:

The Federal Election Commission notified you on September 5, 1980, of a complaint which alleges that the Citizens Committee to Save Massachusetts from Ted Kennedy (the "Committee") violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on 1981, determined that there is reason to believe that the Committee violated 2 U.S.C. § 433 and § 434.

Sections 433 and 434 require political committees to register and report all receipts and disbursements. 2 U.S.C. § 431(4) defines "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year. Pursuant to 2 U.S.C. § 431(9)(A)," "expenditure" includes "any ... distribution ... made by any person for the purpose of influencing an election for Federal office."

Specifically, it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy violated 2 U.S.C. § 433 and § 434 by failing to register as a political committee and report expenditures made in connection with the distribution of leaflets which seek to influence the 1980 Presidential elections.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no response from you in connection with this matter. Please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In absence of any additional information which demonstrates that no further action should be taken against the Citizens Committee to Save Massachusetts from Ted Kennedy 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 have any questions, please contact Beverly Brown, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

Enclosure
First Questions
Procedures

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Citizens Committee to Save Massachusetts from Ted Kennedy	)	MUR 1191
	)	

First Questions

TO: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

The Federal Election Commission requests that you, having knowledge of the information sought herein, submit in writing, within ten (10) days, responses to the following questions. Questions regarding "the leaflets" refer to related communications which are attached hereto and marked Exhibits "A" and "B".

1) State your name, address and principal place of business.

2) What is your position, duties and responsibilities with the Citizens Committee to Save Massachusetts from Ted Kennedy (AKA The Citizens to Protect Massachusetts from Ted Kennedy).

3) How many of the leaflets were distributed?

4) On what date(s) were the leaflets distributed?

5) To whom were the leaflets distributed?

6) Who paid for all costs in connection with the distribution of the leaflets? In this connection, please identify each account from which disbursements were made (i.e., describe each account by account number, the name and address of the financial institution at which the account is or was maintained, the name of the account, the type of account, all persons who had legal access and control of each account, the date each account was opened and, if applicable, the date each account was closed).

7) What was the total cost expended in the distribution of the leaflets (printing, distribution, etc.)?

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Stop Ted Kennedy's Death Cult!

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance of an order to the following person in connection with MUR 1191 (80):

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Vernon Thomson
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MWE

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: SEPTEMBER 17, 1980

SUBJECT: MUR 1191 - Interim Investigative Report #2 dated 9-5-80; Signed 9-15-80; Received in OCS 9-15-80, 3:30

The above-named document was circulated to the Commission on a no-objection basis at 11:00, September 16, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline; however, Commissioner Aikens submitted a question. A copy of the vote sheet is attached.

Sheet

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MWC

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FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

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ATTACHMENT:
Copy of Vote Sheet

BEFORE THE FEDERAL ELECTION COMMISSION
September 5, 1980

In the Matter of)
)
Citizens to Save Massachusetts) MUR 1191 (80)
From Ted Kennedy)

INTERIM INVESTIGATIVE REPORT #2

On August 6, 1980, the Office of General Counsel sent by certified mail a letter to notify Mr. Herbert Quinde of a complaint filed by the Kennedy for President Committee against the Citizens To Save Massachusetts From Ted Kennedy. On September 4, 1980, the notification, which was sent pursuant to 2 U.S.C. § 437g(a)(1), was returned unclaimed.

While Mr. Quinde was not specifically identified as a respondent in this matter, investigations authorized by the Commission on July 1, 1980 derived evidence which indicated that Mr. Quinde may have participated in activities alleged as violating certain provisions of the Federal Election Campaign Act of 1971, as amended. Specifically, a telephone number appearing in the complainant's exhibits was traced to Mr. Quinde who, according to the New England Telephone Company, established an account for the questioned telephone number in August of 1979. This information was brought forth by the General Security Manager of the New England Telephone Company in response to the Commission's Order to Answer Written Questions issued on July 24, 1980.

In order to proceed in this matter we must receive confirmation that Mr. Quinde is a respondent. Our preliminary review of the complaint reveals that many of the fundamental facts of the case must be developed. For purpose of developing such facts we must issue interrogatories to the respondent.

At this time we are sending Mr. Quinde a second notification of the complaint. Our notification will be sent by first class mail to confirm that Mr. Quinde resides at the address identified by the New England Telephone Company.

If, after fifteen days, the notification is not returned, we will proceed to legal analysis of the complaint filed by the Kennedy for President Committee.

15 September 1980
Date

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: AUGUST 19, 1980

SUBJECT: MUR 1191 - Interim Investigative Report #1, dated 8-7-80; Signed 8-11-80; Received in OCS 8-12-80, 11:24

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, August 12, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

BEFORE THE FEDERAL ELECTION COMMISSION
AUGUST 7, 1980

In the Matter of)
) MUR 1191
Citizens to Save Massachusetts)
from Ted Kennedy)

INTERIM INVESTIGATIVE REPORT #1

On July 1, 1980, the Commission directed the Office of General Counsel to continue attempts to identify the name and address of the respondent in the complaint filed by the Kennedy for President Committee. While the complainant had provided a telephone number for which the respondent maintained an account, the name and address of the respondent were necessary to proceed with investigations and to send notification of the complaint pursuant to 2 U.S.C. § 437g(a)(1).

On July 22, 1980, the Commission authorized the issuance of an Order to Answer Written Questions. The order which was sent on July 24, 1980, requested the General Security Manager of the New England Telephone Company to supply the name and address of the individual(s) subscribing to their services and having established an account for the questioned telephone number from January 1, 1979 to the present. On August 4, 1980, the Office of General Counsel received a response from the New England telephone company which revealed that Mr. Herbert Quinde, residing at 118 Beaumont Street, Floor 1, Suite 1, Dorchester, Massachusetts, established an account for the questioned telephone number in August of 1979. Upon receipt of this information the General Counsel's Office sent notification of the complaint to Mr. Quinde.

Pursuant to 2 U.S.C. § 437g(a)(1), the respondent has the opportunity to demonstrate, in writing, to the Commission within 15 days after notification that no action should be taken on the basis of the complaint.

11 August 1980
Date

Charles N. Steele
General Counsel

RECEIVED
GCC 2013
4 PM 4:44

New England Telephone
159 Thomas Burgin Parkway
Quincy, Massachusetts 02169
Phone (617) 479-9252

Daniel F. Driscoll
District Manager-Corporate Security

90467

July 25, 1980

RE: MUR 1191

Max L. Friedersdorf
Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Sir:

In compliance with your letter of July 23, 1980, the following information is provided concerning telephone number: (617) 436-4698.

Subscriber: Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Mass.

Account established: August, 1979

Sincerely,

For John O'Brien

Daniel F. Driscoll
District Manager-Corporate Security

DFD/d

8304041426 3

80 AUG 4 P5:47

GENERAL COUNSEL

RECEIVED
80 AUG 4 PM

New England Telephone

159 Thomas Burgin Pkwy.
Quincy, Massachusetts 02169
Di[illegible] Manager-
Corporate Security

Max L. Friedersdorf
Chairman
Federal Election Commission
Washington, D. C. 20463

BOSTON
JUL 30 '80
MASS.

80 AUG 1 AM 11 29

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 24, 1980

FEDERAL EXPRESS

Paul J. Breslin
General Security Manager
New England Telephone Company
159 Thomas Burgen Parkway
Quincy, Massachusetts 02169

RE: MUR 1191

Dear Mr. Breslin:

Please find enclosed an order to answer questions issued by the Federal Election Commission.

If you have any questions, please contact Beverly Brown (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL EXPRESS

Paul J. Breslin
General Security Manager
New England Telephone Company
159 Thomas Burgen Parkway
Quincy, Massachusetts 02169

RE: MUR 1191

Dear Mr. Breslin:

Please find enclosed an order to answer questions issued by the Federal Election Commission.

If you have any questions, please contact Beverly Brown (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order

8304041426 6

BBB 7/24/80

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS

TO: Paul J. Breslin
General Security Manager
New England Telephone Company
159 Thomas Burgen Parkway
Quincy, Massachusetts 02169

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), Mr. Paul J. Breslin is hereby ordered to reply to the following information request:

(1) Please supply the full name(s) and mailing address(es) for the individual(s) maintaining or having maintained an account with the New England Telephone Company for services rendered from January 1, 1979, to the present at charge to the following telephone number: (617) 436-4698.

Please submit a response to this information request within ten (10) days of your receipt of this letter.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 23rd day of July, 1980.

Max L. Friedersdorf
Max L. Friedersdorf, Chairman
Federal Election Commission

ATTEST:

Margorie W. Emmons
Margorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: JULY 24, 1980

SUBJECT: ORDER IN RELATION TO MUR 1191

The attached order, approved by a vote of 6-0 on July 22, 1980, has been signed and sealed.

8304041426 8

ATTACHMENT:
Order - Breslin

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1191
Citizens to Save Massachusetts from Ted Kennedy	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 22, 1980, the Commission authorized by a vote of 6-0 sending the Order to Answer Written Questions and cover letter as attached to the Memorandum to the Commission dated July 14, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

7/23/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 7-14-80, 1:46
Circulated on tally vote basis: 7-15-80, 11:00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 14, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Authorization to Issue Order in MUR 1191

On March 19, 1980, the Kennedy for President Committee filed a complaint with the Commission alleging that the Citizens to Save Massachusetts from Ted Kennedy violated certain provisions of the Federal Election Campaign Act in connection with the distribution of leaflets which advocate the defeat of Senator Edward M. Kennedy. The complaint, as filed, provided only the name of the respondent and a telephone number at which the public could contact the respondent group for further information.

On June 23, 1980, the Office of General Counsel submitted to the Commission a report which outlined the efforts by this Office to obtain an address for purposes of notifying the respondent of the complaint as well as for purposes of proceeding in this matter. On July 1, 1980, the Commission instructed this Office to contact the New England Telephone Company in order to obtain the name and address of the person(s) maintaining an account for services rendered at charge to the telephone number appearing in the complainant's exhibits.

Per the Commission's instructions, the Office of General Counsel contacted the New England Telephone Company by phone and requested the desired information. We were informed that the telephone number was unpublished and that the requested information could not be released without a formal order. Thus, the Office of General Counsel seeks the Commission's authorization to issue an Order to Answer Written Questions to the General Security Manager of the New England Telephone Company.

Recommendation

1. Authorize the attached Order to Answer Written Questions and cover letter.

Attachments:

Order to Answer Written Questions
Letter to Paul J. Breslin
Authorization Form

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL EXPRESS

Paul J. Breslin
General Security Manager
New England Telephone Company
159 Thomas Burgen Parkway
Quincy, Massachusetts 02169

RE: MUR 1191

Dear Mr. Breslin:

Please find enclosed an order to answer questions issued by the Federal Election Commission.

If you have any questions, please contact Beverly Brown (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order

8304041427 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance of an order to the following person in connection with MUR 1191:

Paul J. Breslin
General Security Manager
New England Telephone Company
159 Thomas Burgen Parkway
Quincy, Massachusetts 02169

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Citizens Committee to Save Massachusetts from Ted Kennedy	)	MUR 1191

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on July 1, 1980, do hereby certify that the Commission decided by a vote of 6-0 to direct that MUR 1191 be referred back to the Office of General Counsel for the purpose of further investigation.

Attest:

7/1/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

returned to OGC 7-1-80

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: JUNE 25, 1980

SUBJECT: OBJECTIONS-
MUR 1191 - First General Counsel's Report dated 6-23-80; Received in OCS 6-23-80, 12:28

The above-named document was circulated on a 48 hour vote basis at 4:00, June 23, 1980.

Commissioners McGarry and Reiche submitted objections to MUR 1191.

This matter will be placed on the Executive Session Agenda for Tuesday, July 1, 1980.

A copy of Commissioner Reiche's vote sheet is attached with his comments.

ATTACHMENT:
Copy of Vote Sheet

RECEIVED
OFFICE OF THE COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Wahington, D.C. 20463

80 JUN 23 P12: 28

FIRST GENERAL COUNSEL'S REPORT

Date and Time of Transmittal
by OGC to the Commission JUN 23 1980

MUR # 1191
Date Complaint Received
By OGC March 19, 1980
Staff Member:
Beverly Brown

Complainant's Name: Kennedy For President Committee

Respondent's Name: The Citizens Committee to Save Massachusetts from Ted Kennedy

Relevant Statute: 2 U.S.C. § 433
2 U.S.C. § 434
2 U.S.C. § 441(d)

Internal Reports Checked: Computer Indices (B index by various sorts)

External Agencies Checked: None

SUMMARY OF ALLEGATIONS

On March 19, 1980, the Kennedy For President Committee filed a complaint with the Federal Election Commission alleging that The Citizens Committee to Save Massachusetts From Ted Kennedy (also known as The Citizens to Protect Massachusetts from Ted Kennedy) had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). (See attached complaint). Specifically, the complainant alleges that The Citizens Committee to Save Massachusetts from Ted Kennedy has failed to:

1) file a statement of organization with the Commission in accordance with 2 U.S.C. § 433;

2) file reports with the Commission in accordance with 2 U.S.C. § 434; and

3) include a notice of communication in accordance with 2 U.S.C. § 441d.

FACTUAL AND LEGAL ANALYSIS

The complaint filed by the Kennedy for President Committee raises legal and factual questions which merit investigation. Based upon the information provided in the complaint it appears that the Citizens Committee to Save Massachusetts from Ted Kennedy may have violated certain provisions of the Federal Election Campaign Act, in connection with the distribution of written communications which expressly advocate the defeat of Senator Edward M. Kennedy, a candidate for the 1980 Presidential nomination. While, this case may merit further investigation, we do not recommend that the Commission proceed at this time. The basis upon which we make this recommendation is as follows:

2 U.S.C. § 437g(a)(1) requires the Commission to notify, within five (5) days after receipt of a complaint, any person alleged in the complaint to have committed a violation of the Federal Election Campaign Act of 1971, as amended.

In an attempt to notify the respondent of the complaint pursuant to 2 U.S.C. § 437g(a)(1), the Office of General Counsel obtained the name and address for the individual whose telephone number appeared in the complainant's exhibits as the telephone number for the Citizens Committee to Save Massachusetts from Ted Kennedy. 1/ Certified and first class notices were sent to the individual (care of the Committee to Save Massachusetts from Ted Kennedy) on March 24, 1980 and March 28, 1980, however, both notices were returned and stamped "unknown" by the Post Office. (See Attachment A)

On April 16, 1980, the Office of General Counsel sent a letter to The Kennedy for President Committee (See Attachment B). This letter informed the complainant of the Commission's attempts to contact the respondent and requested additional information which would enable the Commission to proceed in this matter.

In that the Office of General Counsel has not received a response from the complainant nor any additional information which would enable us to proceed in this matter, we recommend that the Commission close the file.

1/ The Complainant did not provide the address of the respondent in their complaint filed with the Commission. Through the use of the Boston criss-cross directory, we derived the name and address of the individual whose telephone number appeared in the complainant's exhibits.

Recommendation

1) Close the file in this matter.
2) Send the attached letter

Attachments

Complaint
Attachment A
Attachment B
Letter

KENNEDY FOR PRESIDENT

COMPLAINT

March 17, 1980

80 MAR 19 P 2:54

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Mr. Steele:

The Citizens to Protect Massachusetts from Ted Kennedy, also known as the Citizens Committee to Save Massachusetts from Ted Kennedy, has distributed the attached leaflets, which expressly advocate the defeat of Senator Edward M. Kennedy and otherwise seek to influence the Presidential nominations.

It would appear that the Citizens to Protect Massachusetts from Ted Kennedy has committed the following violations of the Federal Election Campaign Act of 1971, as amended, in that it has failed to:

(1) file a statement of organization with the Commission in accordance with 2 U.S.C. § 433;

(2) file reports with the Commission in accordance with 2 U.S.C. § 434; and

(3) include a notice of communication in accordance with 2 U.S.C. § 441(d).

I trust that your office will be able to respond promptly to these clear violations of the Act.

Very truly yours,

John E. Nolan, Jr.
General Counsel

Enclosures

District of Columbia: ss

Subscribed and sworn to before me this 17th day of March, 1980.

My Commission Expires April 14, 1980 Shirley C. Purvis
Notary Public, D.C.

1250 22ND STREET N.W. WASHINGTON D.C. 20037 TELEPHONE: (202) 861-6000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
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POSTAGE AND FEES PAID

8 3 0 4 0 1 1 4 2 2

MOVED
LEFT NO
ADDRESS

87

Mr. John E. Nolan, Jr.
General Counsel
Kennedy for President Committee
1250 22nd Street, N.W.
Washington, D.C. 20037

NOL 50 45159XN1 10/15/82

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

I ought you should be aware this garbage is being distributed in Boston. This is an example of what is wrong with PAC's this and that that they are buying an election.

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] campaign spokesman in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!

Stop Kennedy's Mind-Destroying Dope Pushing!

Stop Ted Kennedy's Death Cult!

IS YOUR CHILD A DOPE ADDICT?
BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Deanne Harris
Committee to Save Massachusetts from
Ted Kennedy
40 Kingsdale Street
Boston, Massachusetts 02124

Re: MUR 1191

Dear Ms. Harris:

This letter is to notify you that on March 19, 1980, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1191. Please refer to this number in all future correspondence.

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. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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 Fran Hagan, the staff member assigned to this matter at 202-523-4057. For your information, we have attached a brief description of the Commission's preliminary procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Complaint
Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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UNDELIVERABLE AS ADDRESSED
DORCHESTER CENTER STATION 02122

UNK

Ms. Deanne Harris
Comm to Save Mass from Ted Kennedy
40 Kingsdale Street
Boston, Mass 02124

U.S. POSTAL SERVICE
31 MAR 1980
-PM

CERTIFIED

544259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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BENDER
DORCHESTER

Ms. Deanne Harris
Committee to Save Mass from Ted Kennedy
40 Kingsdale Street
Boston, Mass 02124

MUR 1191

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 16, 1980

John E. Nolan, Jr., Esquire
General Counsel
Kennedy for President Committee
1250 22nd Street
Washington, D.C. 20037

Re: Citizens Committee to Save Massachusetts from Ted Kennedy (MUR 1191)

Dear Mr. Nolan:

This is in reference to the above captioned complaint which you filed with the Commission on March 19, 1980. In our attempt to notify the respondent in this case, we obtained the name and address of the individual whose telephone number is listed on the organization's leaflets. However, our letters sent by certified and first class mail were stamped "unknown" and returned.

We are interested in pursuing your allegations, but find it impossible to contact the group. If your committee can provide any additional information which would enable us to proceed in this matter, please do so within ten days of receipt of this letter.

Should other information come to your attention, or if you have any questions, please contact Frances B. Hagan, the staff member assigned to this case, at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

8304041429 89

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.

MUR 1191

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 E. Nolan, Jr. Esq.
1250 22nd Street,
Washington, D.C. 20037

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	155470	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

E. Hill

4. DATE OF DELIVERY 4/17/89 POSTMARK

WASHINGTON, D.C. APR 17 1989

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO: 1979-272-302

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John E. Nolan, Jr., Esquire
General Counsel
Kennedy For President Committee
1250 22nd Street
Washington, D.C. 20037

RE: MUR 1191

Dear Mr. Nolan:

The Federal Election Commission notified you in a letter dated April 16, 1980, that in order to proceed in the above-captioned matter, we would need additional information which would assist us in contacting the respondent in this case. Having exhausted all possible avenues for obtaining an address at which the respondent may be contacted, the Commission determined on 1980, to close the file in this matter.

Should you receive further information which might enable the Commission to proceed in this matter, please contact Beverly Brown, the staff member assigned to this matter at (202) 523-4529.

Sincerely,

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:
Herbert Dunde

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945722	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
H7

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1191 B Brown

☆ GPO: 1979-279-[illegible]

8304041429 1

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:
Herbert Lunde

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945722	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
H7

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1979-277-[illegible]

1191 O Brown

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2898

HOLD

$1.11

NOTICE

NOTICE

1/6 FINAL NOTICE SENT

RETURN

24

RETURNED TO SENDER

UNCLAIMED

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Massachusetts

POSTAGE AND FEES PAID

U.S. MAIL

CERTIFIED

945712

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herbert Quinde
118 Beaumont Street
Floor 1, Suite 1
Dorchester, Mass.

Re: MUR 1191

Dear Mr. Quinde:

This letter is to notify you that on March 19, 1980 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1191. Please refer to this number in all future correspondence.

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. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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 Beverly Brown, the staff member assigned to this matter at 202-523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Complaint
Procedures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John E. Nolan, Jr., Esquire
General Counsel
Kennedy for President Committee
1250 22nd Street
Washington, D.C. 20037

Re: Citizens Committee to Save Massachusetts from Ted Kennedy (MUR 1191)

Dear Mr. Nolan:

This is in reference to the above captioned complaint which you filed with the Commission on March 19, 1980. In our attempt to notify the respondent in this case, we obtained the name and address of the individual whose telephone number is listed on the organization's leaflets. However, our letters sent by certified and first class mail were stamped "unknown" and returned.

We are interested in pursuing your allegations, but find it impossible to contact the group. If your committee can provide any additional information which would enable us to proceed in this matter, please do so within ten days of receipt of this letter.

Should other information come to your attention, or if you have any questions, please contact Frances B. Hagan, the staff member assigned to this case, at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

Note to File March 1998

Both Certified and 1st class notices to the respondent were returned - Person unknown - We sent letter to Complainant requesting additional info if available - No need to start again -

fbh

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John E. Nolan, Jr.
General Counsel
Kennedy for President
1250 22nd Street, N.W.
Washington, D.C. 20037

Dear Mr. Nolan:

This letter is to acknowledge receipt of your complaint of March 17, 1980, against the Citizens to Protect Massachusetts from Ted Kennedy which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondent's notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Deanne Harris
Committee to Save Massachusetts from
Ted Kennedy
40 Kingsdale Street
Boston, Massachusetts 02124

Re: MUR 1191

Dear Ms. Harris:

This letter is to notify you that on March 19, 1980, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1191. Please refer to this number in all future correspondence.

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. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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 Fran Hagan, the staff member assigned to this matter at 202-523-4057. For your information, we have attached a brief description of the Commission's preliminary procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Complaint
Procedures

GCCH 762

MUR 1191

KENNEDY FOR PRESIDENT

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
80 MAR 19 P2:54

March 17, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Mr. Steele:

The Citizens to Protect Massachusetts from Ted Kennedy, also known as the Citizens Committee to Save Massachusetts from Ted Kennedy, has distributed the attached leaflets, which expressly advocate the defeat of Senator Edward M. Kennedy and otherwise seek to influence the Presidential nominations.

It would appear that the Citizens to Protect Massachusetts from Ted Kennedy has committed the following violations of the Federal Election Campaign Act of 1971, as amended, in that it has failed to:

(1) file a statement of organization with the Commission in accordance with 2 U.S.C. § 433;

(2) file reports with the Commission in accordance with 2 U.S.C. § 434; and

(3) include a notice of communication in accordance with 2 U.S.C. § 441(d).

I trust that your office will be able to respond promptly to these clear violations of the Act.

Very truly yours,

John E. Nolan, Jr.
General Counsel

Enclosures

District of Columbia: ss

Subscribed and sworn to before me this 17th day of March, 1980.

Shirley C. Purvis
Notary Public, D.C.

My Commission Expires April 14, 1980

1250 22ND STREET N.W. WASHINGTON D.C. 20037 TELEPHONE: (202) 861-6000

IS YOUR CHILD A DOPE ADDICT?
BLAME TED KENNEDY

Ted Kennedy's bid for the presidency of the United States is a rallying cry for all decent Americans to come forward. The truth about Teddy and the Kennedy family must come out into the open. Ted Kennedy is immoral in more ways than his behavior during Chappaquiddick. Kennedy is for the passage of laws to decriminalize marijuana. He and his cohorts around the country want to turn the nation into "Sodom and Gomorrah." He is out to wreck the Democratic Party and turn the nation into one huge drug-gambling empire.

The Meyer Lansky crime syndicate has financed and controlled the Kennedy family since the days of prohibition. "Murder, Inc." assassinated the Kennedy brothers and Reverend Martin Luther King Jr. because they were not immoral enough to sell the American people on a life of austerity, drugs, and gambling. Since Chappaquiddick, the Mob has nothing to worry about from Teddy.

HERE ARE THE FACTS:

• Senator Kennedy is the sponsor of Senate Bill S.1722 which calls for marijuana decriminalization. In 1977 he and Senator McClellan were the original sponsors of a national marijuana decrim bill.

• The Kennedy family is directly represented on the advisory board of the National Organization for Reform of Marijuana Laws (NORML) by ex-brother-in-law Peter Lawford.

• Kennedy's 1976 contributor's list features Joseph Linsey, a Massachusetts bootlegger with connections to the infamous Meyer Lansky. Lansky and Linsey sit on the board of the Miami-based International Hotel Systems Inc.

• During prohibition Papa Joe, the bootlegger, entered into a coalition with Newark's Reinfeld Syndicate, which was 50% owned by the Bronfman gang. The Bronfmans and the Hudson Bay Company began bootlegging in 1916 through the "Pure Drug Distribution Company" using the *Jacobs brothers* as their main contact point across the border through Buffalo. In 1946 Joe Kennedy sold his liquor company, Somerset Importers, Ltd., for $8 million, to the Reinfeld Importers, a revised version of the Reinfeld Syndicate.

• Linsey owns 2 liquor distributing companies, Crown and Whitehall, and a dog racing track in Tauton, Mass. Whitehall's chief salesman, Mike Rocco, was described in McClellan's hearings as a "collection man for the mob."

• Joseph Jr. and David, sons of the late Robert Kennedy, have both been picked up on drug charges. Joseph Jr. was arrested for marijuana charges while David was picked up in a Harlem whorehouse in New York City with heroin. A Kennedy spokesman said David was put in a heroin detox program for heart problems.

• These mob connections and the immoral behavior of the Kennedy family are the reason the Citizens to Protect Massachusetts from Ted Kennedy has come into existence. Ted's Chappaquiddick disaster, Judith Exner Campbell's revelations that Chicago mobster Sam Giancana had given her to Jack, and the well known stories of Papa Joe's bootlegging days are just the tip of the iceberg. The Kennedy machine is organized crime in government. Everytime we look into the eyes of our children and think of their future in a drug infested world one thought must come into our minds. SAVE AMERICA AND OUR CHILDREN FROM TED KENNEDY.

CITIZENS TO PROTECT MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions, and businessmen. This is the first of a series of leaflets. The truth must be known. Call this number to get the facts on the organized crime control of Ted Kennedy. (617) 436-4698

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0 4 0 4 1 4 3 0 2

ht you should be aware this garbage is being distributed in Boston. This is an example of what's wrong with PAC! This and the fact they are buying an government.

Will Teddy Pull the Plug on Rose?

When Rose Kennedy becomes too old and infirm to care for herself, will Teddy deny her the medical and nursing home attention she needs and suggest that she "die with dignity"?

This is what that two-bit cheater from Harvard University, Teddy Kennedy, has recommended for Earle N. Spring. Mr. Spring is a 78-year-old retired chemist from Holyoke. For the last three years, he has received three-times-weekly kidney dialysis treatments at the Holyoke Geriatric Center. But on Jan. 18, Probate Court Judge Sanford Keedy granted an injunction requested by Mr. Spring's family which prevents the center from continuing Mr. Spring's treatments in the name of his "right to die." And without access to a kidney dialysis machine, Earle Spring will die within days.

Mr. Spring has told reporters and medical professionals that he does not want to die. But Kennedy, the same hoodlum who wants to destroy your children's minds with legalized marijuana, has refused to step in and stop this legalized murder. Kennedy has refused to answer calls on the Spring case to his Massachusetts and Washington, D.C. offices. Approached by senior citizens for help in getting Mr. Spring back onto the dialysis machine, [illegible] campaign spokesman in New Hampshire, said: "The Massachusetts courts have spoken."

This is not surprising. After all, Teddy Kennedy is the leading spokesman for the national "right to die" movement. In fact, Kennedy was the keynote speaker last year at the founding conference of the U.S. hospice movement, the operation set up to spread a network of death centers for the elderly across the country. This death cult is supported from the Joseph and Rose Kennedy Center for Bio-Ethics at Georgetown University, which is also the home of the U.S. head of Ayatollah Khomeini's Dark Ages cult—the Muslim Brotherhood.

Teddy the Ghoul's other accomplishments include the drafting of a national "health" bill that would wreck medical care for old and young Americans alike. Teddy's bill, being pushed for pilot implementation here in Massachusetts, would cut national health expenditures by 15 percent, close down hospitals, and "eliminate all unnecessary surgery." In short order it would provide 200,000 elderly nursing-home-bound Americans like Earle Spring with a quicker, cheaper way to die.

Ted Kennedy's contempt for human life did not end at Chappaquiddick. This man, who claims to be a good Catholic, is once again up to his neck in legalized murder. Like his bootlegger father Papa Joe Kennedy before him, Teddy lacks the elementary morality of an ordinary citizen, much less of a senator or President of the United States.

Ted and Rose Kennedy

If Earle Spring can be murdered by the courts in Ted Kennedy's Massachusetts, so can you, your parents, or your grandparents. If Teddy wants to pull the plug on our senior citizens let him start at home with Rose.

CITIZENS COMMITTEE TO SAVE MASSACHUSETTS FROM TED KENNEDY is a nonpartisan coalition of city workers, ethnic minorities, labor unions and businessmen. This is the second of a series of leaflets. The truth must be known. Call this number to get the facts on Ted Kennedy: (617) 436-4698.

Stop Kennedy's Murder of Our Senior Citizens!
Stop Kennedy's Mind-Destroying Dope Pushing!
Stop Ted Kennedy's Death Cult!

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1191

Date Filmed 8/16/83 Camera No. --- 2

Cameraman JRL