



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 1352

Date Filmed 1/6/83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

bank acct - number

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. acy. |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input checked="" type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) tion or |
| <input type="checkbox"/> (5) Internal Documents | |

Signed

L. J. Lerner

date

11-30-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Conciliation - material

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed L. J. Lewis

date 11-24-77

FEC 9-21-77



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

November 8, 1982

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

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

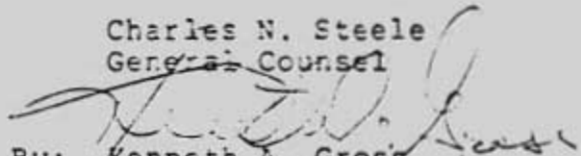
On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of Citizens for LaRouche in settlement of the above-referenced matters. Accordingly, the files have been closed in MURs 1158, 1186, 1253, 1352 and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt respondent and the Commission. Should Citizens for LaRouche wish any such information to become part of the public record, please advise us in writing.

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

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

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Handwritten: 11/5/82

82 OCT 27 PI2: 25

OCT 27 2:58

BEFORE THE FEDERAL ELECTION COMMISSION

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

CONCILIATION AGREEMENT

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

- 2 U.S.C. § 441f;
- 11 C.F.R. § 110.4(c)(2);
- 2 U.S.C. § 441a(f) and;
- 26 U.S.C. § 9042(c)(1)(A).

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

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The Respondent enters voluntarily into this agreement with the Commission.

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

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

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

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

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

(A) MUR 1158

- (1) \$250 cashier's check in the name of Harold Harrison dated 1/14/80.
- (2) \$150 money order in the name of Anne R. Taylor dated 11/20/79.
- (3) \$1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

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

- (2) \$125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (3) \$120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (4) \$100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).
- (5) \$100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).
- (6) \$135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (7) \$85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (8) \$80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (9) \$55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

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

(A) MUR 1158

- (1) \$40 cash contribution made by Ernest Pulsifer.
- (2) \$150 cash contribution made by Ernest Pulsifer.
- (3) \$250 cash contribution made by Nancy Radcliffe.
- (4) \$400 cash contribution made by Belinda F. deGrazia.

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

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

(A) MUR 1158

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

(B) MUR 1253

- (1) \$2,713.53 in contributions from Rochelle Ascher;
- (2) \$1,742.15 in contributions from Karen Brubaker;
- (3) \$1,024.48 in contributions from John Covici;
- (4) \$1,279.55 in contributions from Joseph D'Urso;
- (5) \$3,378.34 in contributions from Elliot Eisenberg;
- (6) \$2,067.32 in contributions from Jeffrey Forrest;
- (7) \$1,409.59 in contributions from Gregory Garnier;
- (8) \$5,120.32 in contributions from Laurence Gray;
- (9) \$3,681.32 in contributions from Marjorie Mazel Hecht;
- (10) \$1,285.87 in contributions from Marsha Kokinda;
- (11) \$1,738.68 in contributions from Melvin Johnson;
- (12) \$1,763.76 in contributions from Michael Smedberg;
- (13) \$1,005.44 in contributions from Martin Simon;
- (14) \$1,507.65 in contributions from David W. Thill;
- (15) \$2,403.90 in contributions from Andrew Wilson;

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- (16) \$1,025 in contributions from August F. Arace;
 - (17) \$1,043 in contributions from James M. Duree;
 - (18) \$1,105 in contributions from Shirley Fingerman;
 - (19) \$1,030 in contributions from John Holly;
 - (20) \$1,044 in contributions from T. J. Hopkins;
 - (21) \$1,150 in contributions from Sherri S. Lightner;
 - (22) \$1,100 in contributions from John Pellicano;
 - (23) \$1,100 in contributions from John Ryman;
 - (24) \$1,120 in contributions from John J. Sakala;
 - (25) \$1,125 in contributions from Walter J. Stevens;
 - (26) \$1,010 in contributions from James Taylor;
 - (27) \$1,030 in contributions from Verne Tomlins;
 - (28) \$1,515 in contributions from Carleton Williams;
 - (29) \$1,580 in contributions from Frederic L. Young;
 - (30) \$2,375 in contributions from Donald J. Carr;
 - (31) \$2,030 in contributions from Ellen G. Scott;
 - (32) \$1,050 in contributions from Belinda F. deGrazia;
 - (33) \$1,250 in contributions from Alexander Ward;
 - (34) \$1,125 in contributions from Mary F. Cummings;
 - (35) \$1,075 in contributions from James M. Everette;
 - (36) \$1,250 in contributions from Michael Micale.

The Commisison has not alleged that these were willful violations.

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

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

(A) MUR 1158

- (1) \$35 money order signed "William Hayden" and dated 1/8/80.
- (2) \$150 money order signed "Ernest Pulsifor" and dated 12/4/79.
- (3) \$250 money order signed "Nancy Radcliff" and dated 9/12/79.
- (4) \$250 money order signed "Robert A. Robinson" and dated 9/12/79.
- (5) \$140 money order signed "Kevin Salisbury" and dated 1/12/80.
- (6) \$450 money order signed "Kevin Salisbury" and dated 1/21/80.
- (7) \$70 money order signed "Charles Clark" and dated 11/13/79.
- (8) \$150 money order signed "Anne R. Taylor" and dated 11/20/79.
- (9) \$45 money order signed "David Sanders" and dated 11/25/79.
- (10) \$25 money order signed "David Sanders" and dated 1/3/79.
- (11) \$1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.
- (12) \$400 money order signed "Belinda F. deGrazia" and dated 1/22/80.
- (13) \$250 cashier's check and signature document for Dr. Harold Harrison.

(B) MUR 1186

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

(C) MUR 1352

- (1) \$200 money order signed "William Lerch" and dated 11/19/79.
- (2) \$55 money order signed "William Lerch" and dated 12/7/79.
- (3) \$135 money order signed "Sherri Waffle" and dated 12/7/79.
- (4) \$85 money order signed "Sherri Waffle" and dated 12/7/79.
- (5) \$80 money order signed "Sherri Waffle" and dated 12/7/79.
- (6) \$125 money order signed "Janice Hart" and dated 12/7/79.
- (7) \$120 money order signed "Janice Hart" and dated 12/7/79.
- (8) \$100 money order signed "Victoria Lacey" and dated 12/10/79.
- (9) \$50 money order signed "Victoria Lacey" and dated 12/10/79.
- (10) \$250 money order signed "Robert Hart" and dated 12/10/79.
- (11) \$100 money order signed "Paul Greenberg" and dated 12/10/79.
- (12) \$100 money order signed "Paul Greenberg" and dated 12/11/79.

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

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

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

- 1) One initial payment of \$5,000, due on December 1, 1982;
- 2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of \$1,000 each;
- 3) Each such installment shall be paid on the first day of the month in which it becomes due;
- 4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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

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

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

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

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

Charles N. Steele
General Counsel

Nov. 5, 1982
Date

By:

Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

10-25-82
Date:

By:

Mayer Morganroth
Counsel for Respondent



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1982

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

Re: MUR 1158

Dear Mr. Morganroth:

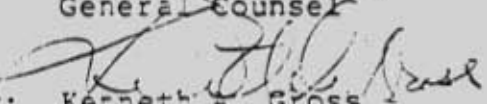
On November 5, 1982, the Commission accepted the conciliation agreement signed by you on behalf of respondent Debra Freeman in settlement of the above-referenced matter. Accordingly, the file has been closed and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B)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

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MUR 1158

Dear Mr. Morganroth:

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

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Handwritten: 11/5/82

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Debra Hanania Freeman

)
) MUR 1158
)

CONCILIATION AGREEMENT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Nov. 5, 1982
Date

Charles N. Steele
General Counsel
Kenneth A. Gross
By: Kenneth A. Gross
Associate General Counsel

Debra Hanania Freeman

10-25-82
Date:

Mayer Morganroth
By: Mayer Morganroth
Counsel for Respondent

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

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

1. Accept the signed conciliation agreements of Citizens for LaRouche and Debra Freeman as submitted with the November 2, 1982, Memorandum to the Commission.
2. Close the files in MURS 1158, 1186, 1253 and 1352.
3. Send the letter to respondents' counsel as attached to the Memorandum to the Commission dated November 2, 1982.

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

Attest:

11-5-82

Date



Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

11-2-82, 4:31
11-3-82, 11:00

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

Thank you.

cc: Gentner (for Lerner)

BEFORE THE FEDERAL ELECTION COMMISSION

82 OCT 27 PI2: 25

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

CONCILIATION AGREEMENT

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

- 2 U.S.C. § 441f;
- 11 C.F.R. § 110.4(c)(2);
- 2 U.S.C. § 441a(f) and;
- 26 U.S.C. § 9042(c)(1)(A).

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

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

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

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

Attachment I
(9 pages - 1 & 9)

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

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

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

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

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

(A) MUR 1158

- (1) \$250 cashier's check in the name of Harold Harrison dated 1/14/80.
- (2) \$150 money order in the name of Anne R. Taylor dated 11/20/79.
- (3) \$1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

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

- (2) \$125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (3) \$120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (4) \$100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).
- (5) \$100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).
- (6) \$135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (7) \$85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (8) \$80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (9) \$55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

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

(A) MUR 1158

- (1) \$40 cash contribution made by Ernest Pulsifer.
- (2) \$150 cash contribution made by Ernest Pulsifer.
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The Commission has not alleged that these were knowing and willful violations.

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

(A) MUR 1158

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

(B) MUR 1253

- (1) \$2,713.53 in contributions from Rochelle Ascher;
- (2) \$1,742.15 in contributions from Karen Brubaker;
- (3) \$1,024.48 in contributions from John Covici;
- (4) \$1,279.55 in contributions from Joseph D'Urso;
- (5) \$3,378.34 in contributions from Elliot Eisenberg;
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- (11) \$1,738.68 in contributions from Melvin Johnson;
- (12) \$1,763.76 in contributions from Michael Smedberg;
- (13) \$1,005.44 in contributions from Martin Simon;
- (14) \$1,507.65 in contributions from David W. Thill;
- (15) \$2,403.90 in contributions from Andrew Wilson;

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- (16) \$1,025 in contributions from August F. Arace;
 - (17) \$1,043 in contributions from James M. Duree;
 - (18) \$1,105 in contributions from Shirley Fingerman;
 - (19) \$1,030 in contributions from John Holly;
 - (20) \$1,044 in contributions from T. J. Hopkins;
 - (21) \$1,150 in contributions from Sherri S. Lightner;
 - (22) \$1,100 in contributions from John Pellicano;
 - (23) \$1,100 in contributions from John Ryman;
 - (24) \$1,120 in contributions from John J. Sakala;
 - (25) \$1,125 in contributions from Walter J. Stevens;
 - (26) \$1,010 in contributions from James Taylor;
 - (27) \$1,030 in contributions from Verne Tomlins;
 - (28) \$1,515 in contributions from Carleton Williams;
 - (29) \$1,580 in contributions from Frederic L. Young;
 - (30) \$2,375 in contributions from Donald J. Carr;
 - (31) \$2,030 in contributions from Ellen G. Scott;
 - (32) \$1,050 in contributions from Belinda F. deGrazia;
 - (33) \$1,250 in contributions from Alexander Ward;
 - (34) \$1,125 in contributions from Mary F. Cummings;
 - (35) \$1,075 in contributions from James M. Everette;
 - (36) \$1,250 in contributions from Michael Micale.

The Commission has not alleged that these were willful violations.

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

(5-49)

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

(A) MUR 1158

- (1) \$35 money order signed "William Hayden" and dated 1/8/80.
- (2) \$150 money order signed "Ernest Pulsifor" and dated 12/4/79.
- (3) \$250 money order signed "Nancy Radcliff" and dated 9/12/79.
- (4) \$250 money order signed "Robert A. Robinson" and dated 9/12/79.
- (5) \$140 money order signed "Kevin Salisbury" and dated 1/12/80.
- (6) \$450 money order signed "Kevin Salisbury" and dated 1/21/80.
- (7) \$70 money order signed "Charles Clark" and dated 11/13/79.
- (8) \$150 money order signed "Anne R. Taylor" and dated 11/20/79.
- (9) \$45 money order signed "David Sanders" and dated 11/25/79.
- (10) \$25 money order signed "David Sanders" and dated 1/3/79.
- (11) \$1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.
- (12) \$400 money order signed "Belinda F. deGrazia" and dated 1/22/80.
- (13) \$250 cashier's check and signature document for Dr. Harold Harrison.

(B) MUR 1186

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

(C) MUR 1352

- (1) \$200 money order signed "William Lerch" and dated 11/19/79.
- (2) \$55 money order signed "William Lerch" and dated 12/7/79.
- (3) \$135 money order signed "Sherri Waffle" and dated 12/7/79.
- (4) \$85 money order signed "Sherri Waffle" and dated 12/7/79.
- (5) \$80 money order signed "Sherri Waffle" and dated 12/7/79.
- (6) \$125 money order signed "Janice Hart" and dated 12/7/79.
- (7) \$120 money order signed "Janice Hart" and dated 12/7/79.
- (8) \$100 money order signed "Victoria Lacey" and dated 12/10/79.
- (9) \$50 money order signed "Victoria Lacey" and dated 12/10/79.
- (10) \$250 money order signed "Robert Hart" and dated 12/10/79.
- (11) \$100 money order signed "Paul Greenberg" and dated 12/10/79.
- (12) \$100 money order signed "Paul Greenberg" and dated 12/11/79.

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

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

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

- 1) One initial payment of \$5,000, due on December 1, 1982;
- 2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of \$1,000 each;
- 3) Each such installment shall be paid on the first day of the month in which it becomes due;
- 4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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

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

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

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

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

Charles N. Steele
General Counsel

Date

By:

Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

16 - 25.82
Date:

By:

Mayer Morganroth
Mayer Morganroth
Counsel for Respondent

(9009)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Debra Hanania Freeman

MUR 1158

CONCILIATION AGREEMENT

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

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

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

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

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

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

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

Attachment II
(4 pages - 1 of 4)

2 OCT 27 11:59

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Charles N. Steele
General Counsel

Date

By: Kenneth A. Gross
Associate General Counsel

Debra Hanania Freeman

Date:

10-25-82

By:

Mayer Morganroth
Mayer Morganroth
Counsel for Respondent

(4 of 4)

020C127



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MURs 1158, 1186, 1253, 1352

Dear Mr. Morganroth:

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

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Attachment III
(2 pages 1 & 2)



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

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

Re: MUR 1158

Dear Mr. Morganroth:

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

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

Thank you.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

(2 of 2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1982

Mayer Morganroth, Esquire
24901 Northwestern Highway
Southfield, Michigan 48075

RE: MUR 1374
Citizens for LaRouche

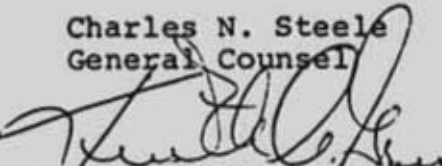
Dear Mr. Morganroth:

On August 24, 1982, the Commission decided to take no further action in this matter. The entire file in this matter has now been closed and will become part of the public record within thirty days.

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

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

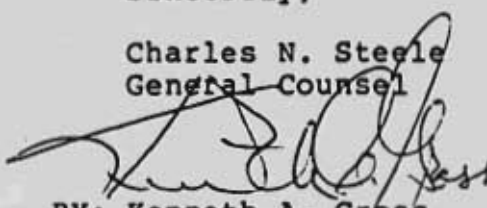
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1982

Elliot Eisenberg
5611 N. Glenwood
Chicago, Illinois 60660

RE: MUR 1253
Elliot Eisenberg

Dear Mr. Eisenberg:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Lawrence Gray

Dear Mr. Gray:

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

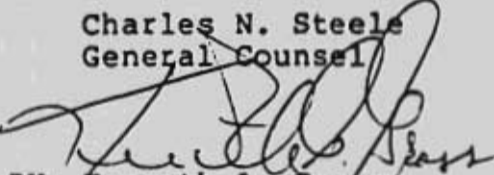
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Donald J. Carr

Dear Mr. Carr:

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

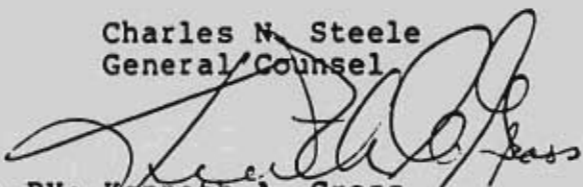
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel

BY:  Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Marjorie Mazel Hecht

Dear Ms. Hecht:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

Andrew Wilson
145 Peachtree Park Drive
Atlanta, Georgia 30309

RE: MUR 1253
Andrew Wilson

Dear Mr. Wilson:

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

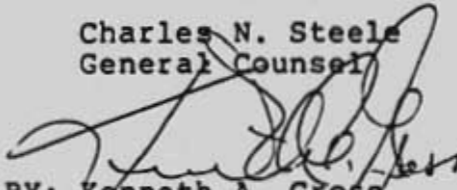
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Jeffrey Forrest

Dear Mr. Forrest:

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

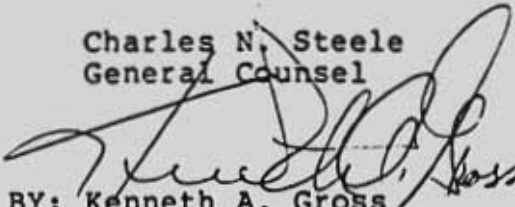
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

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

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

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

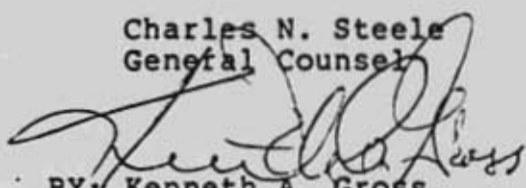
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1982

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

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

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

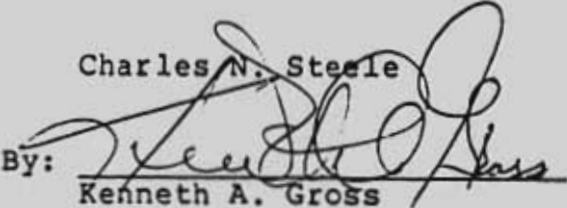
The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele

By:


Kenneth A. Gross
Associate General Counsel

Mayer Morganroth, Esquire
24901 Northwestern Highway
Southfield, Michigan 48075

RE: MUR 1374
Citizens for LaRouche

Dear Mr. Morganroth:

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Elliot Eisenberg
5611 N. Glenwood
Chicago, Illinois 60660

RE: MUR 1253
Elliot Eisenberg

Dear Mr. Eisenberg:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Lawrence Gray

Dear Mr. Gray:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Donald J. Carr

Dear Mr. Carr:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Marjorie Mazel Hecht

Dear Ms. Hecht:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

13740370051



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Andrew Wilson
145 Peachtree Park Drive
Atlanta, Georgia 30309

RE: MUR 1253
Andrew Wilson

Dear Mr. Wilson:

After considering the circumstances of this matter, the Commission on August 1, 1982, decided to take no further action and close its file in this matter as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

RE: MUR 1253
Jeffrey Forrest

Dear Mr. Forrest:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

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

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

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

Sincerely,

Charles N. Steele

By:

Kenneth A. Gross
Associate General Counsel

August 12, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: Q MURs 1158, 1186, 1253, 1352 & 1374

Please have the attached Errata distributed to the
Commission for the meeting of August 17, 1982. Thank you.

Attachment

cc: Lerner

33740670057



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER
AUG 12 1982

82 AUG 12 P 4: 51

August 12, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: Errata to Memorandum
Concerning MURs 1158, 1186, 1253, 1352, and
1374

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

A. MUR 1158

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

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

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

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

The following summarizes the testimony taken in MUR 1158:

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

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

August 11, 1982

MEMORANDUM TO: Marjorie Emons
FROM: Steven Barndollar
SUBJECT: MURs 1158,1186,1253,1352, & 1374

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

Thank you.

Attachment

13740570052

1309070363

In the Matter of)
) MURs 1158, 1166, 1253, 1352, and 1374
Citizens for LaRouche, et al.)

CERTIFICATION:

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

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

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

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

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

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

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

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

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

Attest:

8-24-82

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

August 23, 1982

M MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT:

(MURs 1158, 1186, 1253, 1352 and 1374)

2304067005
Please have the attached Memo to the Commission distributed to the Commission immediately. It is an addendum to a document that is on the agenda of August 24, 1982.

Thank you.

Attachment

cc: Noble



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 AUG 23 P 2: 07

Submitted Late

August 23, 1982

SENSITIVE

MEMORANDUM

EXECUTIVE SESSION

AUG 24 1982

TO: The Commission
FROM: Charles N. Steele
General Counsel
BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: (MURs 1158, 1186, 1253, 1352 and 1374)

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

3374067006

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

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

Recommendation

- 1) ;
- 2) ;
- 3) Take no further action in MUR 1186 with respect to Felice Gelman, and close the file as it pertains to her.
- 4) Take no further action in MUR 1253 with respect to: Rochelle Ascher; Elliott Eisenberg; Jeffrey Forrest; Lawrence Gray; Marjorie Mazel Hecht; Andrew Wilson; Donald J. Carr; and Ellen G. Scott, and close the file as it pertains to each.
- 5) Take no further action in MUR 1374 and close the file.
- 6) Approve the attached letters.

Attachments:

- I. CFL's Response in MUR 1374.
- II.
- III. Proposed Letter to Felice Gelman's Counsel Concerning MUR 1186.
- IV-XI. Proposed Letters to Individual Respondents in MUR 1253.
- XII. Proposed Letter to CFL's Counsel Concerning MUR 1374.

20/ The MUR 1352 file also contains information gathered in connection with the following 1976 MURs: 281, 328, 368 and 398. The Commission voted to merge those MURs into the MUR 1352 file in April 1981. While the evidence obtained during those investigations does not provide a strong basis upon which to file suit, the Office of General Counsel recommends that it be used during conciliation negotiations and that the final disposition of MUR 1352 take into account the additional 1976 MURs.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

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

DATE: AUGUST 16, 1982

SUBJECT:

1374

MURs 1158, 1186, 1253, 1352 and

You were notified previously of an objection by
Commissioner Harris.

Commissioners Reiche and McDonald submitted additional
objections to this matter.

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

337400570053



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY RANSOM
DATE: AUGUST 12, 1982
SUBJECT: OBJECTION - MURs 1158, 1186, 1253,
1352, and 1374

23749370057
The above-named document was circulated to the Commission on
August 12, 1982 at 11:00AM.

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

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 1982

MEMORANDUM

TO: The Commission
FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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

I. BACKGROUND

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

1/

A. MUR 1158

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

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

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

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

The following summarizes the testimony taken in MUR 1158:

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

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

- 2) Ernest K. Pulsifer testified that Lawrence Freeman had solicited him by telephone in late 1979. He met with Freeman and his wife Debra, and discussed LaRouche's campaign. He then went to CFL campaign headquarters and gave a \$100 cash contribution to Mr. Freeman. Pulsifer gave cash contributions to Lawrence Freeman on two other occasions; one for \$40 and one for \$150. When shown a \$150 money order ostensibly signed by him, Pulsifer denied ever having seen it before and pointed out that his name was spelled incorrectly on the money order.
- 3) Nancy Radcliffe testified that she was a CFL volunteer for the 1980 campaign. She admitted making a \$250 cash contribution to CFL which she gave to Debra Freeman. When shown a \$250 money order purportedly signed by her, Radcliffe denied purchasing it or signing it and noted that her name was spelled incorrectly on the money order. Radcliffe said that Debra Freeman had purchased it and that she (Radcliffe) had seen the completed money order among a group of other contributions being sent to the CFL office in New York. Radcliffe then produced a document in which she had acknowledged making a \$250 contribution to CFL on September 10, 1979.^{3/} She indicated that Debra Freeman had asked her to sign the document on February 28, 1980. Although Radcliffe stated that she had seen Freeman regularly during the period between September 10, 1979 and February 28, 1980, she could offer no explanation why Freeman had waited six months to have her acknowledge the contribution.^{4/}

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

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

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

- 4) Dr. Robert A. Robinson stated that he had contributed checks to CFL, but never money orders. When shown a \$250 money order signed Robert A. Robinson, he stated that it was not his signature nor did it appear to be that of his son, Robert A. Robinson, Jr., who had once lived at the address shown on the money order. Dr. Robinson was then shown another \$250 money order with the name Robert A. Robinson, Jr. printed on the signature line. Dr. Robinson did not recognize the printing on the money order and pointed out that the house number on the address was different from the number on the previous money order.
- 5) Kevin Salisbury stated that he had contributed to LaRouche, but could not recall how much or whether the contributions were by cash or check. He did recall that he had given the contributions to Debra Freeman. When shown a \$140 money order signed "Kevin Salisbury" he could not recall whether he had purchased it or had ever seen it. He did testify that the signature was not his. Salisbury was uncooperative when asked about the circumstances surrounding the purchase of a \$450 money order, but did state that none of the printing on it was his. He pointed out that the letters t and p in the word "apt." in the address were transposed. An acknowledgement card admittedly signed by Salisbury contained the same mistake, leading to the conclusion that the money order was filled out by someone after the acknowledgement was signed.
- 6) Charles Clark's testimony was confusing, however, he seemed to indicate that he had purchased tickets to LaRouche fundraisers on three occasions. The tickets cost \$25, \$20 and \$15, but it appears as though Clark paid for them in installments by giving \$5-\$10 at a time to Debra Freeman or Steve Warm. It was Warm who asked him to sign an acknowledgement that he had contributed \$70 to CFL. It was Warm who told him that his contributions totalled \$70. When shown the \$70 money order in his name, Clark said he had never contributed a money order nor had he made a single \$70 contribution.

- 7) Ann A. Taylor - When shown a money order for \$150 containing her address and signed "Anne R. Taylor", Ms. Taylor stated that she had never purchased a money order in her life nor had she ever contributed to CFL. In addition, she noted that the spelling of her first name was incorrect and the middle initial in the signature was different than hers.
- 8) David Sanders denied purchasing or signing both a \$45 and a \$25 money order purportedly signed by him. He said he had given cash contributions to CFL and assumed that they were turned into money orders so they could be sent through the mail, but he never instructed anyone to purchase the money orders for him. Sanders was shown one of two signed acknowledgements submitted to the Commission which stated that he had contributed a \$45 money order to CFL. He testified that the signature on it was not his. (Sanders was not shown the second acknowledgement.) Sanders was also asked about a \$1,009.58 check from Household Finance made out to him and endorsed over to CFL. He stated that he had obtained a personal loan to buy furniture, but decided to give the money to CFL instead. He was then shown an acknowledgement of that contribution signed by David Sanders and by Lenore Sanders as his spouse. Sanders indicated that he did not know a Lenore Sanders. His wife's name is Diana Sayoun. He could not recall whether the Lenore Sanders signature had appeared on the acknowledgement when he signed it.^{5/} He also testified that the \$1,009.58 contribution was his alone, and that he was never told by anyone at CFL that it was illegal to contribute over \$1,000 to one campaign.
- 9) Diana Sayoun was shown the acknowledgement document containing the name Lenore Sanders. Sayoun stated that she did not sign it, she had never used the name Lenore Sanders and she did not know Lenore Sanders. She did state that she had once received a letter from the U.S. Labor Party addressed to Lenore Sanders. Sayoun said that someone from the U.S. Labor Party had tried to get her to sign a contribution acknowledgement, but she refused because she had never contributed. She said her

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

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

- 10) Belinda deGrazia Haight was shown a \$400 money order and signature acknowledgement document signed "Belinda F. deGrazia". She denied signing the money order and stated she had given a \$400 cash contribution to Debra Freeman.
- 11) Steven Warm was shown a \$100 money order with his name on it. He did not recall the money order nor did he think he signed it. He stated he had made one money order contribution, but did not know if the money order shown was the one he contributed. He indicated he may have contributed cash and someone else bought the money order. He admitted the signature on the accompanying acknowledgement document was his, but could not recall who had asked him to sign it. When told his money order and that of Belinda deGrazia were consecutively numbered, he indicated he had no explanation for the coincidence.

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

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

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

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

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

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

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

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

B. MUR 1186

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

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

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

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

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

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

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

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

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

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

C. MUR 1253

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

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

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

D. MUR 1352

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

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

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

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

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

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

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

- 1) Robert Hart, Janice Hart and Paul Greenberg denied ever purchasing or signing the money orders and stated that they "could not recall" making contributions in the amounts shown on the money orders;
- 2) Sander Peretz Fredman testified that he had purchased money orders for himself and, at the instruction of Elliot Eisenberg,^{14/} had also purchased other money orders. When faced with three consecutively numbered money orders containing the signature "Sherri Waffle", Fredman testified that he "might" have purchased and signed them for his friend Ms. Waffle.
- 3) Victoria Lacey testified that she had made three contributions to CFL: a \$100 check; a \$100 money order; and a \$50 money order. She admitted signing the \$50 and \$100 money orders shown to her, but said someone at CFL had purchased them. She "could not recall" whether she had paid for them before or after they were purchased and stated that many people at CFL were involved in purchasing money orders. Lacy also stated that December 10, 1979, the date on both her money orders, was the date of a big CFL fundraising event.^{15/} When shown a third money order purportedly signed by her, Lacy initially denied purchasing it, but later admitted both purchasing and signing it. Her description of the circumstances surrounding its purchase is questionable. She testified that she took the \$250, which she had received as a gift from her parents, with her to Lombard, a town 90 miles from Chicago, on a day she was campaigning for contributions. She purchased the money order in Lombard rather than buying it in Chicago, but provided no explanation for doing so.

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

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

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- 4) John Brown, Jr. testified that he made contributions to CFL by putting money in a slot in the "campaign desk" in the CFL office. He also put cash receipts from the sale of materials in or on that desk. Brown said he did not know who gathered the money or what happened to it after it was left in the desk. Brown admitted signing a \$120 money order shown to him, but "did not know" whether he had purchased it or whether he had even contributed \$120 to CFL.
 - 5) Robert E. Pierce testified that he has purchased several money orders for CFL including one from a Missouri bank. Pierce said he gave these money orders to Elliot Eisenberg who oversaw Pierce's fundraising activities. Pierce stated that he put the contributions he had collected into the "fundraising desk". When shown a \$100 money order with his name on it, Pierce admitted signing it, but said Gerald Pechenuk had purchased it. He had given Pechenuk cash, but "could not recall" whether he had instructed Pechenuk to purchase a money order.
 - 6) Mitchell Hirsch stated that he had gone with other CFL members to purchase money orders, however, all money orders he purchased were for his own contributions. Hirsch recalled purchasing and signing both money orders attributed to him, but did not recall accompanying Gerald Pechenuk to purchase the December 13, 1979 money order even though Pechenuk's December 13, 1979 money order lists the next consecutive number to Hirsch's. Hirsch recalled soliciting a credit card contribution from William Lerch by telephone. He gave the credit card information Lerch provided to Elliot Eisenberg, but did not have any further information concerning the transaction.
 - 7) William Lerch, the contributor solicited by Mitchell Hirsch, testified that he had charged two contributions on his credit card -- the first for \$200, the second for \$50. Both contributions were made by telephone. When shown the two money orders attributed to him, Lerch admitted signing the one for \$200, but could not recall the circumstances of the signing. He stated that he had authorized the purchase of the money order by his telephone contribution. When shown the \$55 money order, Lerch denied ever making a \$55 contribution or signing the money order.

- 8) Gerald Rose was subpoenaed because Janice Hart, Robert Hart, Robert Pierce and Victoria Lacey indicated that he was in charge of the Chicago CFL office. Mr. Rose testified that he was the political director of the office, but had no direct connection with fundraising efforts.
- 9) Robert Cole was subpoenaed because Janice Hart and Victoria Lacey indicated that they turned collected contributions over to Cole. Cole denied any big part in the fundraising effort. He did not recall receiving contributions from Hart, Lacey or anyone else. He said he merely totalled up figures that were given to him and sometimes counted money. Other than those aspects, he denied any knowledge of, or involvement in, the financial side of the Chicago CFL operation.

E. MUR 1374

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

II. DISCUSSION

A) 26 U.S.C. § 9042(c)(1)(A)

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

1) MUR 1158

- a) \$35 money order signed "William Hayden." Rev. Hayden denied having made a contribution to CFL, purchasing the money order or signing it.
- b) \$150 money order signed "Ernest Pulsifer." Debra Freeman admitted purchasing the money order after Pulsifer had made a cash contribution. (Pulsifer's name is spelled incorrectly on the money order.)

- c) \$250 money order signed "Nancy Radcliff". Debra Freeman admitted purchasing and signing the money order after Radcliffe had made a cash contribution. (Radcliffe's name is spelled incorrectly on the money order.)
- d) \$250 money order signed "Robert A. Robinson". Dr. Robert A. Robinson said the signature was not his nor did it appear to be that of his son, Robert A. Robinson, Jr. The signature differed greatly from another money order signed "Robert A. Robinson, Jr.".
- e) \$140 money order signed "Kevin Salisbury". Salisbury did not recall contributing the money order and denied signing the money order. (No separate signature document was submitted.)
- f) \$450 money order signed "Kevin Salisbury". Salisbury denied ever seeing the money order before the deposition.
- g) \$70 money order signed "Charles Clark". Debra Freeman admits filling out and signing the money order. Clark testified that he only made cash contributions and never made one, single contribution in the amount of \$70.
- h) \$150 money order signed "Anne R. Taylor". The Ann Taylor found at the address submitted by CFL denied the signature and the contribution.
- i) \$45 money order signed "David Sanders". Debra Freeman admitted purchasing and signing the money order. Sanders said he contributed cash.
- j) \$25 money order signed "David Sanders". Sanders denied signing the money order and said the contribution was made in cash.
- k) \$1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders as spouse. Diana Sayoun, David Sanders' wife denied signing the document and denied making the contribution.
- l) \$400 money order signed "Belinda F. deGrazia". Belinda F. deGrazia Haight said she made the \$400 contribution in cash.

- m) \$250 cashier's check and signature document for Dr. Harold Harrison. George Ward, bank Vice President testified that bank records show Debra Freeman purchased the check with funds from her personal account. No Dr. Harold Harrison resided at the address submitted by CFL.
- 2) MUR 1186
- a) \$40 money order and signature document signed "Harold Harper". Harper said he gave \$30 cash to a CFL representative.
- 3) MUR 1352
- a) \$200 money order signed "William Lerch". Lerch admitted the signature but stated he has made the contribution via credit card.
- b) \$55 money order signed "William Lerch". Lerch denied the signature and denied making any contribution in that amount. (No separate signature document was submitted.)
- c) \$135 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)
- d) \$85 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)
- e) \$80 money order signed "Sherri Waffle". Sander Fredman admitted signing it. (No separate signature document was submitted.)
- f) \$125 money order signed "Janice Hart". Janice Hart denied purchasing or signing the money order. (No separate signature document was submitted.)
- g) \$120 money order signed "Janice Hart". Janice Hart denied purchasing or signing the money order. (No separate signature document was submitted.)
- h) \$100 money order signed "Victoria Lacey". Lacey stated someone else at CFL had purchased it. She did pay for it.
- i) \$50 money order signed "Victoria Lacey". Lacey did not know who purchased it. She did pay for it.

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- j) \$250 money order signed "Robert Hart". Robert Hart denied purchasing or signing it. (No separate signature document was submitted.)
- k) \$100 money order signed "Paul Greenberg" and dated December 10, 1979. Greenberg denied purchasing or signing it. (No separate signature document was submitted.)
- l) \$100 money order signed "Paul Greenberg" and dated December 11, 1979. Greenberg denied signing it. (No separate signature document submitted.)
- m) \$120 money order signed "John H. Brown, Jr.". Brown did not recall purchasing it or making the \$120 contribution.

A) 2 U.S.C. § 441f

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

- 1) MUR 1158
- a) \$250 cashier's check in the name of Harold Harrison. Bank records show the funds actually came from Debra Freeman's account.
- b) \$150 money order in the name of Anne R. Taylor. Ann Taylor testified she never made the contribution.
- c) \$1,009.58 loan check from Household Finance Company submitted with signature acknowledgement indicating the check was contributed by both David Sanders and Lenore Sanders, his spouse. Diana Sayoun, David Sanders' wife, said she never made the contribution.^{16/}

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

2) MUR 1352

- a) \$250 money order signed "Robert Hart". (No accompanying signature document.) Robert Hart denied purchasing or signing the money order and did not recall making a contribution in that particular amount.
- b) \$125 money order signed "Janice Hart". (No accompanying signature document.) Janice Hart denied purchasing or signing the money order and could not recall making a contribution in that amount.
- c) \$120 money order signed "Janice Hart". See subsection (b), supra.
- d) \$100 money order signed "Paul Greenberg". (No accompanying signature document.) Greenberg denied purchasing or signing the money order and said the only contribution he ever made to CFL was a refund check for about \$6.00.
- e) \$100 money order signed "Paul Greenberg". See subsection (d), supra.
- f) \$135 money order signed "Sherri Waffle". Evidence indicates that Sander Fredman actually purchased, signed and submitted the money order.
- g) \$85 money order signed "Sherri Waffle". See subsection (f), supra.
- h) \$80 money order signed "Sherri Waffle". See subsection (f), supra.
- i) \$55 money order signed "William Lerch". Lerch denies making the contribution.
- j) \$120 money order signed "John H. Brown, Jr.". Brown admitted signing the money order, but did not recall ever making the contribution.

C) 11 C.F.R. § 110.4(c)(2)

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

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

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

- 1) MUR 1158
 - a) \$40 cash contribution made by Ernest Pulsifer. Pulsifer testified this contribution was made after he had already made a \$100 cash contribution.
 - b) \$150 cash contribution made by Ernest Pulsifer. Pulsifer testified this was contributed after he had already made both a \$100 and a \$40 cash contribution.
 - c) \$250 cash contribution made by Nancy Radcliffe. Radcliffe testified she made the contribution in cash to Debra Freeman.
 - d) \$400 cash contribution made by Belinda F. deGrazia. Belinda deGrazia Haight testified she made the contribution in cash to Debra Freeman.

D) 2 U.S.C. § 441a(f)

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

- 1) MUR 1158
 - a) \$1,009.58 Household Finance Company loan check from David Sanders. Sanders testified that the entire \$1,009.58 was contributed by him, alone. Not only does the check exceed the limitation, but Sanders also testified he had made about six other contributions to CFL during the presidential primary campaign, including, specifically, a \$45 and a \$25 contribution.
- 2) MUR 1253
 - (1) \$2,713.53 in contributions from Rochelle Ascher;
 - (2) \$1,742.15 in contributions from Karen Brubaker;
 - (3) \$1,024.48 in contributions from John Covici;
 - (4) \$1,279.55 in contributions from Joseph D'Urso;

- (5) \$3,378.34 in contributions from Elliot Eisenberg;
- (6) \$2,067.32 in contributions from Jeffrey Forrest;
- (7) \$1,409.59 in contributions from Gregory Garnier;
- (8) \$5,120.32 in contributions from Lawrence Gray;
- (9) \$3,681.32 in contributions from Marjorie Mazel Hecht;
- (10) \$1,285.87 in contributions from Marsha KoKinda;
- (11) \$1,738.68 in contributions from Melvin Johnson;
- (12) \$1,763.76 in contributions from Michael Smedberg;
- (13) \$1,005.44 in contributions from Martin Simon;
- (14) \$1,507.65 in contributions from David W. Thill;
- (15) \$2,403.90 in contributions from Andrew Wilson;
- (16) \$1,025 in contributions from August F. Aracé;
- (17) \$1,043 in contributions from James M. Duree;
- (18) \$1,105 in contributions from Shirley Fingerman;
- (19) \$1,030 in contributions from John Holly;
- (20) \$1,044 in contributions from T. J. Hopkins;
- (21) \$1,150 in contributions from Sherri S. Lightner;
- (22) \$1,100 in contributions from John Pellicano;
- (23) \$1,100 in contributions from John Ryman;
- (24) \$1,120 in contributions from John J. Sakala;
- (25) \$1,125 in contributions from Walter J. Stevens;
- (26) \$1,010 in contributions from James Taylor;
- (27) \$1,030 in contributions from Verne Tomlins;
- (28) \$1,515 in contributions from Carleton Williams;
- (29) \$1,580 in contributions from Frederic L. Young;

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- (30) \$2,375 in contributions from Donald J. Carr;
- (31) \$2,030 in contributions from Ellen G. Scott;
- (32) \$1,050 in contributions from Belinda F. deGrazia;
- (33) \$1,250 in contributions from Alexander Ward;
- (34) \$1,125 in contributions from Mary F. Cummings;
- (35) \$1,075 in contributions from James M. Everette;
- (36) \$1,250 in contributions from Michael Micale.

Contributions 1-15, listed above, were given in the form of advances made by individuals on behalf of CFL.^{18/} Although the individuals were reimbursed for the advances, CFL did not reimburse them within a reasonable time.

limitation.^{19/} Contributions 16-36, listed above, consisted of outright gifts to CFL which, in the aggregate, exceeded each individual's contribution limitation.

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

^{19/} 11 C.F.R. § 100.7(a)(4) provides that the term "contribution" does not include the extension of credit by any person for a length of time within normal business or trade practice. However, this limited exemption is geared toward businesses and commercial vendors which have standardized billing cycles whereby goods or services are routinely provided first and paid for later. In the General Counsel's view, individuals carrying out volunteer political activities, rather than business or commercial activities, cannot claim the benefit of this specific exemption.

17. MISCELLANEOUS

A) MUR 1186 -- Felice Gelman Violation

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

B) MUR 1253 - Excessive Contributions by the Individual Respondents

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

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

C) MUR 1374 - Knowing and Willful Violations

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

December 12, 1982, CFL repaid the matching funds in question. Nothing found in the investigation suggests a "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act," the standard applied for a knowing and willful violation in American Federation of Labor and Congress of Industrial Organizations v. NLRB, 628 F.2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 111 (1980).

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

Recommendation

- 1) ~~_____~~
- 2) ~~_____~~
- 3) Take no further action in MUR 1186 with respect to Felice Gelman, and close the file as it pertains to her.
- 4) Take no further action in MUR 1253 with respect to: Rochelle Ascher; Elliott Eisenberg; Jeffrey Forrest; Lawrence Gray; Marjorie Mazel Hecht; Andrew Wilson; Donald J. Carr; and Ellen G. Scott, and close the file as it pertains to each.
- 5) Take no further action in MUR 1374 and close the file.
- 6) Approve the attached letters.

Attachments:

- I. CFL's Response in MUR 1374.
- II. ~~_____~~
- III. Proposed Letter to Felice Gelman's Counsel Concerning MUR 1186.
- IV-XII. Proposed Letters to Individual Respondents in MUR 1253.
- XIII. Proposed Letter to CFL's Counsel Concerning MUR 1374.

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June 7, 1982

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

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

Re: MUR 1374

Dear Mr. Gross:

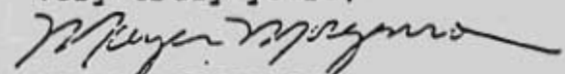
Pursuant to your letter dated May 28, 1982 concerning the above referenced MUR:

1. Citizens for LaRouche denies that there was any knowing or willful violation of 26 U.S.C. 9042 (c)(1)(A) in this matter by CFL or any "agent" of CFL.
2. The circumstances of the bookkeeping errors which led to this matter were fully disclosed to the Audit Division when the errors were mutually discovered by the FEC Audit Division and CFL.
3. CFL repaid the monies to the Treasury which are at issue here.
4. Citizens for LaRouche does not believe that allegations of criminal violations of the FECA and FEC investigations should or can be premised on such investigative fancies as are stated in the factual and legal analysis to this MUR, namely:

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

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

Very truly yours,


MAYER MORGANROTH
24901 Northwestern Highway
Southfield, Michigan 48075
ATTACHMENT I 1 of 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MUR 1186 - Felice Gelman

Dear Mr. Perrin:

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

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

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

Sincerely,

Charles N. Steele

By:

Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Ellen G. Scott

Dear Mrs. Scott:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

13

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

RE: MUR 1253
Jeffrey Forrest

Dear Mr. Forrest:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Andrew Wilson
145 Peachtree Park Drive
Atlanta, Georgia 30309

RE: MUR 1253
Andrew Wilson

Dear Mr. Wilson:

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

RE: MUR 1253
Marjorie Mazel Hecht

Dear Ms. Hecht:

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Donald J. Carr

Dear Mr. Carr:

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Lawrence Gray

Dear Mr. Gray:

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Elliot Eisenberg
5611 N. Glenwood
Chicago, Illinois 60660

RE: MUR 1253
Elliot Eisenberg

Dear Mr. Eisenberg:

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1253
Rochelle Ascher

Dear Ms. Ascher:

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

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

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

1010700000

Mayer Morganroth, Esquire
24901 Northwestern Highway
Southfield, Michigan 48075

RE: MUR 1374
Citizens for LaRouche

Dear Mr. Morganroth:

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

May 26, 1982

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

RE: FEC MURS, CITIZENS for LAROUX.

LADIES AND Gentlemen:

This is to notify you that MAYER MORBANEDON, ESQ.,
is an attorney for Citizens for LAROUX and represents
Citizens for LAROUX in enforcement matters currently
pending before the FEC.

Very Truly yours,

Patricia Dolbear Salisbury
Treasurer

JUN 1 11:16



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE *WCE*
FROM: MARJORIE W. EMMONS / JODY C. RANSOM *JCR*
DATE: MAY 10, 1982
SUBJECT: MURs 1158, 1186, 1352 - Comprehensive
Investigative Report, signed May 6, 1982

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 2:00,
May 7, 1982.

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

33740370105

May 7, 1982

MEMORANDUM TO: Marjorie W. Simmons
FROM: Phyllis A. Kaysan
SUBJECT: MURs 1158, 1186, 1352

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

Attachment

cc: Lerner

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
MAY 7 1980

82 MAY 7 A 9: 10

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

COMPREHENSIVE INVESTIGATIVE REPORT

I. BACKGROUND

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

A. MUR 1158

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

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

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

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

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

The following summarizes the testimony taken in Baltimore:^{2/}

- 1) Reverend William Hayden was shown a \$35 money order made out to CFL with his name and address printed on the sender line. He said he had never seen the money order nor had he ever contributed anything to CFL. He said he had given \$35 cash to Robert Primack for an annual membership in the National Anti-Drug Coalition (NADC) Conference. He has not seen or heard from Primack since then.
- 2) Ernest K. Pulsifer testified that Lawrence Freeman had solicited him by telephone in late 1979. He met with Freeman and his wife Debra, and discussed LaRouche's campaign. He then went to CFL campaign headquarters and gave a \$100 cash contribution to Mr. Freeman. Pulsifer gave cash contributions to Lawrence Freeman on two other occasions; one for \$40 and one for \$150. When shown a \$150 money order ostensibly signed by him, Pulsifer denied ever having seen it before and pointed out that his name was spelled incorrectly on the money order.
- 3) Nancy Radcliffe testified that she was a CFL volunteer for the 1980 campaign. She admitted making a \$250 cash contribution to CFL which she gave to Debra Freeman. When shown a \$250 money order purportedly signed by her, Radcliffe denied purchasing it or signing it and noted that her name was spelled incorrectly on the money order. Radcliffe said that Debra Freeman had purchased it and that she (Radcliffe) had seen the completed

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

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

money order among a group of other contributions being sent to the CFL office in New York. Radcliffe then produced a document in which she had acknowledged making a \$250 contribution to CFL on 9/10/79.^{3/} She indicated that Debra Freeman had asked her to sign the document on 2/28/80. Although Radcliffe stated that she had seen Freeman regularly during the period between 9/10/79 and 2/28/80, she could offer no explanation why Freeman had waited six months to have her acknowledge the contribution.^{4/}

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

- 4) Dr. Robert A. Robinson stated that he had contributed checks to CFL, but never money orders. When shown a \$250 money order signed Robert A. Robinson, he stated that it was not his signature nor did it appear to be that of his son, Robert A. Robinson, Jr., who had once lived at the address shown on the money order. Dr. Robinson was then shown another \$250 money order with the name Robert A. Robinson, Jr. printed on the signature line. Dr. Robinson did not recognize the printing on the money order and pointed out that the house number on the address was different from the number on the previous money order.
- 5) Kevin Salisbury stated that he had contributed to LaRouche, but could not recall how much or whether the contributions were by cash or check. He did recall that he had given the contributions to Debra Freeman. When shown a \$140 money signed "Kevin Salisbury" he could not recall whether he had purchased it or had ever seen it. He did testify that the signature was not his. Salisbury was

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

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

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

- 6) Charles Clark's testimony was confusing, however, he seemed to indicate that he had purchased tickets to LaRouche fundraisers on three occasions. The tickets cost \$25, \$20 and \$15, but it appears as though Clark paid for them in installments by giving \$5-\$10 at a time to Debra Freeman or Steve Warm. It was Warm who asked him to sign an acknowledgement that he had contributed \$70 to CFL. It was Warm who told him that his contributions totalled \$70. When shown the \$70 money order in his name, Clark said he had never contributed a money order nor had he made a single \$70 contribution.
- 7) Ann A. Taylor - When shown a money order for \$150 containing her address and signed "Anne R. Taylor", Ms. Taylor stated that she had never purchased a money order in her life nor had she ever contributed to CFL. In addition, she noted that the spelling of her first name was incorrect and the middle initial in the signature was different than hers.
- 8) David Sanders denied purchasing or signing both a \$45 and a \$25 money order purportedly signed by him. He said he had given cash contributions to CFL and assumed that they were turned into money orders so they could be sent through the mail, but he never instructed anyone to purchase the money orders for him. Sanders was shown one of two signed acknowledgements submitted to the Commission which stated that he had contributed a \$45 money order to CFL. He testified that the signature on it was not his. (Sanders was not shown the second acknowledgement.) Sanders was also asked about a \$1,009.58 check from Household Finance made out to him and endorsed over to CFL. He stated that he had obtained a personal loan to buy furniture, but decided to give the money to CFL instead. He was then shown an acknowledgement of that contribution signed by David Sanders and by Lenor Sanders as his spouse. Sanders indicated that he did not

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

- 9) Diana Sayoun was shown the acknowledgement document containing the name Lenore Sanders. Sayoun stated that she did not sign it, she had never used the name Lenore Sanders and she did not know Lenore Sanders. She did state that she had once received a letter from the U.S. Labor Party addressed to Lenore Sanders. Sayoun said that someone from the U.S. Labor had tried to get her to sign a contribution acknowledgement, but she refused because she had never contributed. She said her husband had told her that the \$1,009.58 check was a loan to the U.S. Labor Party which they repaid in monthly installments. However, she indicated that she did not believe him, but felt that he had told her that story so she would not be angry with him because he had contributed such a large amount to the U.S. Labor Party.
- 10) George B. P. Ward, Jr., vice president for the Maryland National Bank testified concerning the bank records of Debra Hanania Freeman. The records were subpoenaed in an effort to learn more about the earlier described \$250 cashier's check ostensibly contributed by Dr. Harold H. Harrison.^{6/} Those records indicated that Debra Freeman had withdrawn \$750 from her account and used \$250 of that money to purchase the cashier's check. The bank copy of the check contained only the notation typed "CUSTOMER REQUEST BY: DEBRA HANANIA FREEMAN" indicating the other information was added after the purchase.

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

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

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

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

B. MUR 1186

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

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

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

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

Those deposed indicated that they had either purchased the money orders in question or given Martin Simon cash and authorized^{9/} him to purchase money orders for them. In some cases Simon returned with the money orders and the contributors filled them out, while in others Simon presumably filled out the money orders. All contributors stated that Simon requested them to sign a document acknowledging their contributions. Each of those documents listed the dates and the amounts of the contributions, and specified "money order" as the method of payment. In all cases, the contributors acknowledged their contributions.

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

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

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

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

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

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

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

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

C. MUR 1352

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

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

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

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

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

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

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

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

- 1) Robert Hart, Janice Hart and Paul Greenberg denied ever purchasing or signing the money orders and stated that they "could not recall" making contributions in the amounts shown on the money orders;
- 2) Sander Peretz Fredman testified that he had purchased money orders for himself and, at the instruction of Elliot Eisenberg,^{16/} had also purchased other money orders. When faced with three consecutively numbered money orders containing the signature "Sherri Waffle", Fredman testified that he "might" have purchased and signed them for his friend Ms. Waffle.
- 3) Victoria Lacy testified that she had made three contributions to CFL: a \$100 check; a \$100 money order; and a \$50 money order. She admitted signing the \$50 and \$100 money orders shown to her, but said someone at CFL had purchased them. She "could not recall" whether she had paid for them before or after they were purchased and stated that many people at CFL were involved in purchasing money orders. Lacy also

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

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

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

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

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

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- 4) John Brown, Jr. testified that he made contributions to CFL by putting money in a slot in the "campaign desk" in the CFL office. He also put cash receipts from the sale of materials in or on that desk. Brown said he did not know who gathered the money or what happened to it after it was left in the desk. Brown admitted signing a \$120 money order shown to him, but "did not know" whether he had purchased it or whether he had even contributed \$120 to CFL.
 - 5) Robert E. Pierce testified that he has purchased several money orders for CFL including one from a Missouri bank. Pierce said he gave these money orders to Elliot Eisenberg who oversaw Pierce's fundraising activities. Pierce stated that he put the contributions he had collected into the "fundraising desk". When shown a \$100 money order with his name on it, Pierce admitted signing it, but said Gerald Pechenuk had purchased it. He "could not recall" whether he had instructed Pechenuk to do so.
 - 6) Mitchell Hirsch stated that he had gone with other CFL members to purchase money orders, however, all money orders he purchased were for his own contributions. Hirsch recalled purchasing and signing both money orders attributed to him, but did not recall accompanying Gerald Pechenuk to purchase the 12/13/79 money order even though Pechenuk's 12/13/79 money order lists the next consecutive number to Hirsch's. Hirsch recalled soliciting a credit card contribution from William Lerch by telephone. He gave the credit card

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

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

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

II. STATUS OF INVESTIGATIONS

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

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

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

May 6, 1982
Date

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Associate General Counsel

Attachments

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

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

Page 10 of 11

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WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGEMENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
David Sanders	Money Order	signed	denied	\$45	11/25/80	Two submitted a) 12/20/79	a) Sander's denied signature, Freeman says only "sample" not sent to New York	She purchased and signed money order
						b) 2/23/80	b) Not shown to Sanders	
David Sanders	Money Order	signed	denied	\$25	1/3/80	none		
David Sanders	HFC check	endorsed David Sanders	admitted	\$1009.50	1/22/80	1/22/80	admits signing	was not present when it was signed printed the names below signatures
Diana Sayoun	"	"	"	"	"	1/22/80	denies signing "Lenore Sanders"	

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

Attachment II

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

ATTACHMENT A
MUR 1158

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

Attachment I (1)

WITNESS	TYPE OF INSTRUMENT	SIGNATURE INFORMATION	SIGNATURE ADMITTED/DENIED	AMOUNT	DATE ISSUED	ACKNOWLEDGEMENT DATE	ACKNOWLEDGEMENT INFORMATION	FREEMAN'S TESTIMONY CONCERNING INSTRUMENT
David Sanders	Money Order	signed	denied	\$45	11/25/80	Two submitted a) 12/20/79	a) Sander's denied signature, Freeman says only "sample" not sent to New York	She purchased and signed money order
						b) 2/23/80	b) Not shown to Sanders	
David Sanders	Money Order	signed	denied	\$25	1/3/80	none		
David Sanders	HFC check	endorsed David Sanders	admitted	\$1009.58	1/22/80	1/22/80	admits signing	was not present when it was signed printed the names below signatures
Diana Sayoun	"	"	"	"	"	1/22/80	denies signing "Lenore Sanders"	



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

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

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

- 1) Belinda A. DeGrazia - Baltimore
- 2) Steven G. Warm - Baltimore
- 3) Robert Cole - Chicago
- 4) Gerald Rose - Chicago
- 5) Felice M. Gelman

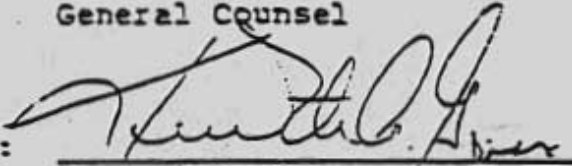
During your conversation with Ms. Lerner you indicated that you do not consider the MUR investigations and the Dolbeare litigation to be separate matters. Please be informed, however, that this Office will treat them separately for investigative purposes. Accordingly, all correspondence concerning MURs 1158, 1186, 1352 and 1384 should be directed to Ms. Lerner; all correspondence concerning MURs 1253 and 1374 should be directed to Michael Dymersky; and, all correspondence concerning the litigation should continue to be directed to Marsha Gentner.

As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

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

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

- 1) Belinda A. deGrazia - MUR 1158
- 2) Steven G. Warm - MUR 1158
- 3) Gerald Rose - MUR 1352
- 4) Robert Cole - MUR 1352
- 5) Felice Gelman - MUR 1158, 1186, 1352


Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

James F. Schoener, Esq.
Page Two

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,



Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

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

Re: Citizens for LaRouche
MUR Deposition Schedule

Dear Mr. Schoener:

Ms. Gentner has forwarded a copy of your April 21, 1982 letter concerning the deposition schedule to me. I was unable to determine from that letter whether you were postponing both the enforcement and the litigation depositions scheduled for April 26-29th, or merely the litigation depositions. Your proposed deposition schedule does not include the name Belinda deGrazia, a witness scheduled for enforcement deposition only, nor does it explain whether Steven Warm, Robert Cole and Felice Gelman are represented by you for purposes of both the enforcement and litigation depositions. By letters dated April 6 and April 20, enclosed herein, I asked you to inform this Office of your status as counsel for the five witnesses scheduled for depositions pursuant to the MUR investigations. As of this date, I have received no response to that request. Absent such information, we must assume you are not representing those witnesses at the MUR depositions, and proceed with our original schedule, including the Belinda deGrazia and Steven Warm April 26 and April 29th depositions in Baltimore.

James M Schoener
Page Two

In the event that you are representing these witnesses for purposes of the enforcement depositions, Lois Lerner of this Office should be notified immediately.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

- 1) April 6, 1982 letter to counsel
- 2) April 20, 1982 letter

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Batch 7628

02 APR 29 01:46

Mayer Morganroth

Attorney at Law

Telephone (313) 355-3084

FAX 8102244558 Morganroth Selt

Suite 314-B Heritage Plaza

24901 Northwestern Highway

Southfield, Michigan 48075

April 27, 1982

Kenneth A. Gross, Esq.
Lois Lerner, Esq.
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Re: Dolbeare, et. al. v. Federal Election
Commission, MUR 1352, Robert Cole

Dear Mr. Gross and Ms. Lerner:

I have been informed that I no longer represent Robert Cole and that Mr. Cole no longer wishes to remain a plaintiff in the above action. Therefore, I will be unable to produce him for deposition in Chicago as scheduled on May 4, 1982. We are prepared to go ahead with the deposition of Gerald Rose. In terms of time and expense, however, it might make more sense to reschedule Mr. Rose's deposition for New York when the rest of the depositions are being taken there. Please let my office know your thoughts on this matter.

Very truly yours,

Morganroth

Mayer Morganroth

MM:br

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1982

Gary Abrams, Esquire
135 S. LaSalle Street
Suite 2610
Chicago, Illinois 60603

Re: Dolbeare v. FEC
and MUR 1352

Dear Gary:

This is to finalize the schedule for the Robert Cole depositions. We will begin at 10:00 a.m. on Thursday, June 10, 1982 continuing through June 11, if necessary.

I noticed on the substitution of attorneys attached to your last letter, that you notified the court you were substituting for Mayer Morganroth. I believe the attorney of record is actually James Schoener. Although it creates no problem with your notice to this office, you might want to check on this matter and clear any possible discrepancy with the court.

Sincerely,

Lois

Lois G. Lerner
Attorney

33040570134

Mayer Morganroth

Attorney at Law

Telephone (313) 355-3084

TWA 8102244558 Morganroth Soft

RECEIVED

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Suite 314-B Heritage Plaza

24901 Northwestern Highway

Southfield, Michigan 48075

July 16, 1981

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

Mark 1352

1 JUL 20 A10:54

Re: Depositions

Dear Mr. Bogin:

I would like to take this opportunity to thank you for your cooperation today with regard to the postponement of the depositions scheduled for Friday, July 17, 1981.

I did talk briefly with Mr. Morganroth this afternoon and he reassured me that his trial would continue through Friday and that it would be impossible for him to attend.

Because of his going out of state next week on business and you being gone on his available dates the first week in August, he requested that I confirm with you by letter the new deposition date of August 11, 1981.

In Mr. Morganroth's absence and on his behalf, I again thank you for your assistance.

Very truly yours,

Barbara I. Edwards

Barbara I. Edwards, Secretary to
MAYER MORGANROTH

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 27, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Felice M. Gelman
2 South Pinehurst
Apt. 5A
New York, NY 10033

Dear Ms. Gelman:

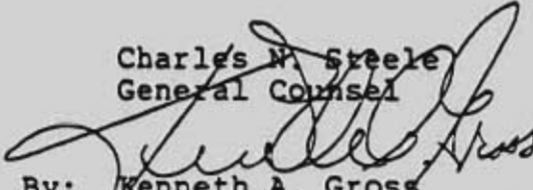
Please find enclosed a subpoena requesting your appearance for deposition on May 24, 1982. Pursuant to 11 C.F.R. § 111.14, a check for a witness fee for your attendance will be presented to you at the deposition.

I would like to remind you of the provisions of 2 U.S.C. § 437g(a)(12) which prohibit making public any Commission investigation without the written consent of the person with respect to whom such investigation is made. You are advised that no such consent has been given in this matter.

Please contact Lois Lerner, the attorney assigned to this matter, at (202) 523-4175 if you have any questions or problems concerning the enclosed subpoena.

Sincerely,

Charles W. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure:

Subpoena

737037

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena To Appear For Deposition Upon Oral Examination

TO: Felice M. Gelman
2 South Pinehurst
New York, N.Y. 10033

RE: Matter Under Review 1186

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Presidential Primary Matching Payment Account Act by the following persons: Citizens for LaRouche and Felice M. Gelman.

Notice is hereby given that the deposition is to be taken at the Congressional Hearing Room, 26 Federal Plaza (Duane and Broadway), New York City, New York at 2:30 p.m. on Monday, May 24, 1982, and any and all dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 26th day of April, 1982.

Frank P. Reiche
Federal Election Commission

ATTEST:

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1982

HAND DELIVERED

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

Re: Citizens for LaRouche
MUR Deposition Schedule

Dear Mr. Schoener:

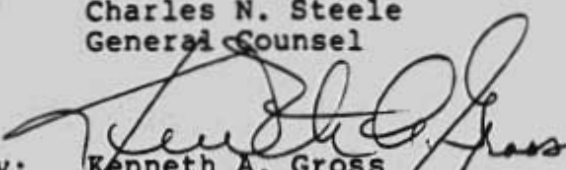
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James M Schoener
Page Two

In the event that you are representing these witnesses for purposes of the enforcement depositions, Lois Lerner of this Office should be notified immediately.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosures

- 1) April 6, 1982 letter to counsel
- 2) April 20, 1982 letter

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

James F. Schoener, Esq.
Miller, Canfield, Paddock
and Stone
Suite 300
1888 M Street, N.W.
Washington, D.C. 20037

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

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- 2) Steven G. Warm - Baltimore
- 3) Robert Cole - Chicago
- 4) Gerald Rose - Chicago
- 5) Felice M. Gelman

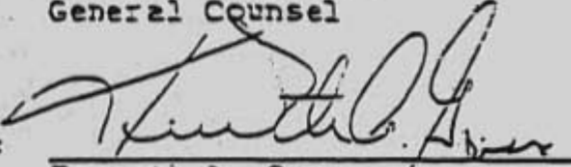
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As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

33743673142



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

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

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

- 1) Belinda A. deGrazia - MUR 1158
- 2) Steven G. Warm - MUR 1158
- 3) Gerald Rose - MUR 1352
- 4) Robert Cole - MUR 1352
- 5) Felice Gelman - MUR 1158, 1186, 1352

Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

James F. Schoener, Esq.
Page Two

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,



Kenneth A. Gross

Associate General Counsel

13740370141

REC'D 7593
02 APR 21 12:37

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

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

TELEPHONE (202) 822-9333
TELECOPIER (202) 463-8071

SIDNEY T. MILLER (1884-1940)
GEORGE L. CANFIELD (1888-1988)
LEWIS H. PADDOCK (1889-1938)
FERRIS D. STONE (1882-1948)

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

EMMETT E. SABAN
WILLIAM G. BUTLER
JOHN A. GILPAT, JR., P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD S. OUSHEE, P.C.
PETER F. THURBER
LAWRENCE A. RIND, P.C.
ROBERT E. HAMMILL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C.*
GEORGE E. PARKER III*
RICHARD A. JONES, P.C.
STEVEN J. JELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
ROBERT S. KETCHUM, P.C.
SAMUEL J. HIFIN, P.C.
RODOLFE E. LUFFORD, P.C.
JOEL L. PIELL
ROBERT E. GILBERT
BRUCE D. BIRDBAUER
DAVID OLMSTEAD

GEORGE T. STEVENSON
JOHN A. THURBER, P.C.
ORIN D. BRUSTAD
CARL H. VAN ENDE
GORDON A. BECKER
DAVID D. JOSEPH, P.C.
CHARLES L. BURLEIGH, JR.
JOHN A. HARRIS, P.C.
GREGORY L. CURTNER, P.C.
DENNIS R. NEIMAN
KENNETH E. KENOP
LEONARD D. OWENS
W. NAGA FAISON
MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS G. SCHROETER
THOMAS P. MUSTOLES
JOHN D. RICH
WILLIAM J. DANNOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
MICHAEL W. HARTMANN
KENT E. SHAFER
JOHN J. COLLINS, JR.

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

EXECUTIVE CENTRE
2M EAST ELM AVENUE
MONROE, MICHIGAN 48111
(313) 243-2000

110 BUSINESS & TRADE CENTER
200 WASHINGTON SQUARE NORTH
LANSING, MICHIGAN 48203
(817) 487-2070

WABER BUILDING
BIRMINGHAM, MICHIGAN 48012
(313) 648-8000

1999 WEST BAY SHORE DRIVE
TRAVERSE CITY, MICHIGAN 49684
(616) 946-1000

DENNIS R. LOY
FRANK L. ANDREWS
THOMAS W. LURN
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME A. WATSON
DONNA J. DONATI
DONALD W. KEIM
LARRY J. SAYLOR*
CHARLES E. SCHOLL
MICHAEL J. BERTAL
MICHAEL R. ATKINS
MAUREEN P. AUGHTON
LELAND D. BARRINGER
EDW. D. EINOWSKI
TIMOTHY D. BOCHOCKI
THOMAS C. PHILLIPS
HUGH N. SMITH
HARJORY G. BASILE
TERRENCE H. CRAWFORD
STEPHEN R. GOODSTRE
RYAN H. HAYWOOD
GEORGE D. MARTIN
CHARLES H. MCVEN

GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN D. STOUT
ANANDA VAN DUSEN
BRAN A. RASER
GARY A. BRUDER
RONALD J. CLAPHAM
DAVID F. DRON
BALLY L. GEIS
PAT J. JOHNSON
E. ELIZABETH PERLMAN
FREDERICK STICHNOY
J. SCOTT TIMMER
CONRAD L. HALLETT, JR.
JOHN D. RAYIS
STEPHEN J. OTT
LINDA G. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLMAN
TANYA T. HILL
NINETTE BUTRA

* ADMITTED IN MICHIGAN & DISTRICT OF COLUMBIA

April 21, 1982

HAND DELIVERED

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

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

Dear Ms. Gentner:

In response to your letter of April 20, 1982, please be advised that the scheduled depositions for April 26th-29th in Baltimore in the above-referenced matters and action should be postponed because my co-counsel and I will be unable to attend.

As it is presently contemplated, Mr. Mayer Morganroth, co-counsel, will be attending all of the depositions and suggests the alternate dates of May 18th and 19th for the Baltimore depositions. The May 5th date for St. Louis should also be adjourned, preferably to June 1st. These dates have been confirmed with Mr. Morganroth, and if they will not suit your schedules, please contact him directly at (313) 355-3084. The attached revised schedule would be followed thereafter.

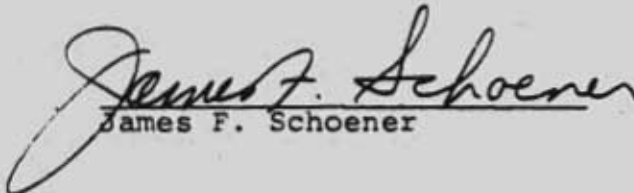
11:21 PM
4:56

MILLER, CANFIELD, PADDOCK AND STONE
Marsha Gentner, Esq. -2- April 21, 1982

We do reserve the right to object to the Portland, Oregon depositions and the St. Louis depositions, since the costs involved in taking that discovery are maximum and the discovery minimal. Since you have already deposed the Portland people previously, this seems to be wasteful on your part and certainly harassment of our people.

Please note that Mr. Morganroth proposes to take depositions of F.E.C. Commissioners and former Commissioner Tiernan on May 10th and 11th. I assume you will make arrangements to have them available.

Very truly yours,


James F. Schoener

JFS:mfb
Enclosure
cc w/e: Mayer Morganroth, Esq.

33040370145

Schedule of Depositions

02 APR 21 P12:37

13040870147

May 3, 1982	Chicago	Rose
May 4, 1982	Chicago	Cole
May 10, 1982	Washington	Commissioners
May 11, 1982	Washington	Commissioners
May 18, 1982	Baltimore	Radcliffe
May 18, 1982	Baltimore	Warm
May 18, 1982	Baltimore	Raney
May 19, 1982	Baltimore	Robinson
May 19, 1982	Baltimore	Freeman
May 20, 1982	Washington	Simon
May 24, 1982	N.Y.C.	Gelman
May 25, 1982	N.Y.C.	Forrest
May 25, 1982	N.Y.C.	Burdman
May 26, 1982	N.Y.C.	Dolbeare
*June 1, 1982	St. Louis	Carr
*June 10, 1982	Portland, Oregon	Mrs. Kahl
*June 10, 1982	Portland, Oregon	Sam Kahl
*June 11, 1982	Portland, Oregon	Billows
*June 11, 1982	Portland, Oregon	Mursmansky

*We reserve the right to ask the Court to limit these depositions in light of the cost involved and limited area of discovery.

9 2 0 1 2 - 7 1 1 3

32 APR 29 AM : 46

**EXPRESS
MAIL**
NEXT DAY SERVICE

POST OFFICE TO ADDRESSEE



FROM:

Customer Number (if any)

TO:

EXPRESS MAIL SERVICE

LABEL 11B DEC 80 U.S.G.P.O. 1981 348-724



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

HAND DELIVERED

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

Re: Citizens for LaRouche MURs

1352

Dear Mr. Schoener:

In response to your April 15, 1982 letter you will find listed below the names of the witnesses that the Federal Election Commission presently intends to call in order to complete its outstanding MUR investigations. As requested, the list includes an itemization of the MUR(s) each witness' testimony pertains to.

- 1) Belinda A. deGrazia - MUR 1158
- 2) Steven G. Warm - MUR 1158
- 3) Gerald Rose - MUR 1352
- 4) Robert Cole - MUR 1352
- 5) Felice Gelman - MUR 1158, 1186, 1352

Should the Commission determine that additional testimony is necessary to complete the above-cited investigations, you will be promptly notified.

As of this date we have received no response from you concerning your status as counsel for the above-listed witnesses for purposes of the MUR depositions. If you will be representing them, written confirmation of our April 15, 1982 deposition schedule or an alternative schedule should be promptly forwarded to Ms. Lerner. In the event that you desire to change the schedule, please keep in mind that some witnesses are scheduled for both litigation and MUR depositions. The present schedule attempts to avoid inconvenience by setting both depositions of such witnesses on the same day. Any alternate schedule should do the same. If we do not receive the above-described notice of representation from you by the close of business on Wednesday,

James F. Schoener, Esq.
Page Two

April 21, 1982, we will assume you are not representing the specified witnesses, and the depositions will go forward as outlined in our April 15, 1982 letter to you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", is written over the typed name.

Kenneth A. Gross
Associate General Counsel

13740370150



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Deposition Schedule --
Citizens for LaRouche MURs

Dear Mr. Schoener:

Pursuant to your April 13, 1982 telephone conversation with Lois Lerner of this office, please find below a schedule for the Citizens for LaRouche MUR depositions.

1) Belinda A. deGrazia

Monday, April 26, 1982 at 2:30 p.m., United States Courthouse, Room 820, 101 W. Lombard Street, Baltimore, Maryland.

2) Steven G. Warm

Thursday, April 29, 1982 at 2:30 p.m., Fallon Federal Building, Room 308, 31 Hopkins Plaza, Baltimore, Maryland.

3) Gerald Rose

Monday, May 3, 1982 at 2:00 p.m., Dirksen Federal Building, Room 1669, 219 S. Dearborn Street, Chicago, Illinois.

4) Robert Cole

Tuesday, May 4, 1982 at 2:00 p.m., Dirksen Federal Building, Room 1669, 219 S. Dearborn Street, Chicago, Illinois.

5) Felice M. Gelman

Monday, May 24, 1982 at 2:00 p.m., Congressional Hearing Room, 26 Federal Plaza (Duane & Broadway), New York City, New York.

James Scheoner, Esq.
Page Two

As you have indicated that you are not yet certain whether you will be representing the above-listed persons, I have also sent the schedule to the attorneys of record for the deponents.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", written in a cursive style.

Lawrence M. Noble
Assistant General Counsel

13040370152



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 314B
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1352

Dear Mr. Morganroth:

The recent decision in Dolbeare v. Fed. Election Comm'n., No. 81 CIV 4468 (S.D.N.Y. March 9, 1982), permits the Federal Election Commission to continue its investigation in the above-referenced matter. This is to notify you, as attorney of record, of the following deposition schedule:

- 1) Gerald Rose

Monday, May 3, 1982 at 2:00 p.m., Dirksen Federal Building, Room 1669, 219 S. Dearborn Street, Chicago, Illinois.

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

Sincerely,

Lawrence M. Noble
Assistant General Counsel

cc: Gerald Rose

MUR 1352

Lerner

Form 3811, Jan. 1979

1. The following service is requested (check one.)

☐ Show to whom and date delivered.....

☐ Show to whom, date and address of delivery.....

☐ RESTRICTED DELIVERY -
Show to whom and date delivered.....

☐ RESTRICTED DELIVERY -
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Gerald Rose
4127 W. Belle Plaine
Chicago, Ill. 60641

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	796546	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Sue Rose

4. DATE OF DELIVERY
4-17-82

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

INITIALS

★ GPO : 1979-500-499

MUR 1352

Lerner

Form 3811, Jan. 1979

1. The following service is requested (check one.)

☒ Show to whom and date delivered.....

☐ Show to whom, date and address of delivery.....

☐ RESTRICTED DELIVERY -
Show to whom and date delivered.....

☐ RESTRICTED DELIVERY -
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mayer Morgenthau, Esq.
Suite 314B
24901 Northwestern Highway
Southfield, Mich. 48075

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943764	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

[Signature]

4. DATE OF DELIVERY
APR. 20 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

INITIALS

★ GPO : 1979-500-499



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 15, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 314B
24901 Northwestern Highway
Southfield, Michigan 48075

Re: MUR 1352

Dear Mr. Morganroth:

The recent decision in Dolbeare v. Fed. Election Comm'n., No. 81 CIV 4468 (S.D.N.Y. March 9, 1982), permits the Federal Election Commission to continue its investigation in the above-referenced matter. This is to notify you, as attorney of record, of the following deposition schedule:

2) Robert Cole

Tuesday, May 4, 1982 at 2:00 p.m., Dirksen Federal Building, Room 1669, 219 S. Dearborn Street, Chicago, Illinois.

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

Sincerely,

Lawrence M. Noble
Assistant General Counsel

cc: Robert Cole



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1982

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

Re: Citizens for LaRouche MURs

Dear Mr. Schoener:

On March 30, 1982, Lois Lerner of this Office telephoned you concerning the Citizens for LaRouche MUR investigations. Ms. Lerner explained that she was anxious to move forward with those investigations and asked whether you would be representing certain witnesses at their depositions. You indicated that you would have to consult with the Citizens for LaRouche Offices in New York concerning the issue of representation and asked for the names of the witnesses involved. At present they are:

- 1) Belinda A. DeGrazia - Baltimore
- 2) Steven G. Warm - Baltimore
- 3) Robert Cole -- Chicago
- 4) Gerald Rose - Chicago
- 5) Felice M. Gelman

During your conversation with Ms. Lerner you indicated that you do not consider the MUR investigations and the Dolbeare litigation to be separate matters. Please be informed, however, that this Office will treat them separately for investigative purposes. Accordingly, all correspondence concerning MURs 1158, 1186, 1352 and 1384 should be directed to Ms. Lerner; all correspondence concerning MURs 1253 and 1374 should be directed to Michael Dymersky; and, all correspondence concerning the litigation should continue to be directed to Marsha Gentner.

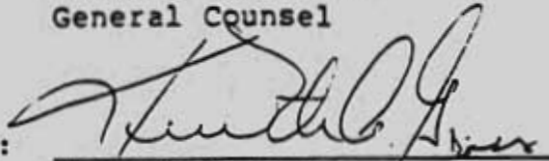
James Schoener, Esq.
Page Two

As it is in the best interests of all parties involved to have the investigations completed as expeditiously as possible, we ask for your full and prompt cooperation in these matters.

Sincerely,

Charles N. Steele
General Counsel

By:



Kenneth A. Gross
Associate General Counsel

33740570157



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 30, 1982

MEMORANDUM

TO: The File

FROM: Lois Lerner *LL*
Attorney

RE: MURs 1158, 1186, 1352 and 1384

Spoke with Jim Schoener about the Citizens for LaRouche (CFL) MURs. I asked him whether he was representing the parties that had been subpoenaed for depositions prior to the Dolbeare Motion for Preliminary Injunction. He said he had to speak with the New York Office of the CFL and asked that I write him a letter including the names of those I was interested in learning about. I asked him if we could do it by phone and confirm by letter so that we could get going as soon as possible on the investigation. He said that it had to wait until the order was signed anyway. I told him I did not think that was so because the order would allow these depositions, and added that, in any event, the matter was set to be heard by the court tomorrow. He said he had an arrangement with Marsha to postpone it for a week, and that he would want to start his discovery also. I then told him that I wanted to make it clear that the MUR investigation and the litigation were totally separate. He disagreed with our effort to "compartmentalize", and said both the MUR investigation and the discovery were all part of the same lawsuit. He then made a cryptic statement that I did not follow, but would not repeat it when I told him I did not understand what he meant.

I finally told him I would send him a letter with the names of those I wished to depose and he said he would respond and let me know whether he represented them. I also asked if he could assist me in locating people in Chicago we had been unable to serve. He said CFL in New York had supplied us with addresses and if the people were no longer at those addresses he would have no further information on them.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CHICAGO
JUN 23 1981
R. S.

Earl Konecki
Pinkerton's Incorporated
1000 Lake Street
Oak Park, Illinois 60301

RE: MUR 1352(81)

Dear Mr. Konecki:

Per conversations with this Office, enclosed please find subpoenas that this Office requests that you serve upon Gerald Pechenuk and Elliot Eisenberg. The last known Chicago address for Mr. Pechenuk is 3817 North Lawndale. The last known address for Mr. Eisenberg is 5611 North Glenwood.

Please give periodic status reports to Robert Bogin at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
2 cover letters and subpoena

12:38 P 3:21



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

Gerald Pechenuk
3817 North Lawndale
Chicago, Illinois 60618

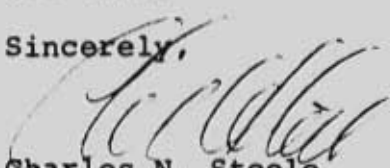
RE: MUR 1352(81)

Dear Mr. Pechenuk:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Friday, July 17, 1981, at noon. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

RE: MUR 1252(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a), (b)(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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Gerald Pechenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll-free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 123-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

33049370162

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

SUBPOENA

TO: Gerald Rechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

1370167
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg., 219 S. Dearborn St., Chicago, Ill. 60604, at 10:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert L. Bordin (702-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.

John Warren McGarry
John Warren McGarry
Chairman
Federal Election Commission

WITNESS:

Marjorie W. Emons
Marjorie W. Emons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 19, 1981

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Illinois 60660

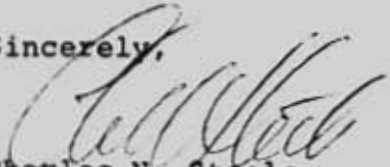
RE: MUR 1352(81)

Dear Mr. Eisenberg:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Friday, July 17, 1981, at 2:00 p.m. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Eisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Elliot R. Eisenberg
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of \$2.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Subpoena

117740370155

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


SUBPOENA

TO: Elliot Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

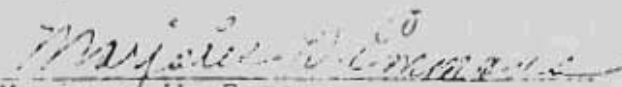
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 10:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Segin (202-623-4690), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emons
Secretary to the Commission

8 3 0 4 0 3 7 0 1 3 8
P.O. Box 24
River Forest, Ill. 60305



Mr. Robert Bogin
Federal Election Commission
Washington, D.C. 20463

Personal & Confidential

8 3 0 4 0 3 7 0 1 3 8

PINKERTON'S, INC.

Gee # 5069
mkt 1352

Client		Character of Case	
Federal Election Commission		Serve Subpoena	
Office of Origin	File No.	Status	
Chicago	CHI-W629	Continuing	
Reporting Office	Report Made By	Date of Report	
Chicago	DDN	Wednesday, July 8, 1981	

Serve: Elliot Eisenberg
Gerald Pechenuk
Federal Election Commission

Efforts were made to contact Eisenberg at the Fusion Energy Foundation, at 116 S. Michigan Avenue, Chicago, Illinois, 782-2666 which also lists to Gerald Rose or Rose Gerald at the same address, but I received no response.

Evelyn Pechenuk is listed at 3817 N. Lawndale Avenue, Chicago, Illinois, 478-1034, but I have received no response here, with the intention being to interview her under pretext to find out where Gerald Pechenuk is.

7/13/81
cb

JUL 15 4:34

P.O. Box 24
River Forest, Ill. 60305



Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

81 JUL 15 AM: 58

Personal & Confidential

8 3 0 4 0 3 7 0 1 7

PINKERTON'S, INC.

QCC #3050

MOR 250

Client		Character of Case
Federal Election Commission		Serve Subpoena
Office of Origin	File No.	Status
Chicago	CHI-W629	Continuing
Reporting Office	Report Made By	Date of Report
Chicago	DDN	Thursday, July 2, 1981

Serve: Gerald Pechenuk
Federal Election Commission

Proceeded to the Pechenuk place of residence at 3817 N. Lawndale Avenue, Chicago, Illinois, but again received no response. I was able to contact a Mrs. Neuhaus the third floor tenant who informed that Mrs. Pechenuk lived here and was usually home in the evening. She further advised however, that Gerald Pechenuk possibly does not live here and may be separated from his wife. My inquiries were made under pretext and this source did not have any further information.

Upon concluding the above efforts I returned to the Chicago office and discontinued pending further instructions.

7/7/81
cb

11 JUL 10 P 1:29

CER...

PINKERTON'S, INC.

Client		Character of Case	
Federal Election Commission		Serve Subpoenas	
Office of Origin	File No.	Status	
Chicago	CHI-W629	Continuing	
Reporting Office	Report Made By	Date of Report	
Chicago	DDN	Tuesday, June 30, 1981	

Serve: Elliot Eisenberg
 Gerald Pechenuk
 Federal Election Commission

Upon receiving preliminary details I proceeded to 116 S. Michigan, ninth floor, Chicago, Illinois said to be Fusion Energy Foundation where the subject, Elliot Eisenberg is employed. The secretary for the small firm was approached under pretext regarding the subject, but was informed that I might find him in around 3:00 P.M. or 4:00 P.M. The secretary excused herself to make a telephone call from the inner office area and it was believed that she may have contacted Eisenberg and was screening me. It was further believed that the secretary was being deceptive when she said that she had no other location, or home address where Eisenberg could be contacted. In line with my pretext no further in depth inquiries could be made.

On this date I also proceeded to the alleged residence of Gerald Pechenuk, located at 3817 N. Lawndale Avenue, Chicago, Illinois. The subject's name was posted for the second floor apartment, but no response was received.

Upon concluding the above efforts I returned to the Chicago office and discontinued upon preparing and rendering this report.

7/7/81
 cb

1 JUL 10 8 1:29

PINKERTON'S, INC.

Client		Character of Case
Federal Election Commission		Serve Subpoenas
Office of Origin	File No.	Status
Chicago	CHI-W629	Continuing
Reporting Office	Report Made By	Date of Report
Chicago	DDN	Tuesday, June 30, 1981

Serve: Elliot Eisenberg
 Gerald Pechenuk
 Federal Election Commission

Upon receiving preliminary details I proceeded to 116 S. Michigan, ninth floor, Chicago, Illinois said to be Fusion Energy Foundation where the subject, Elliot Eisenberg is employed. The secretary for the small firm was approached under pretext regarding the subject, but was informed that I might find him in around 3:00 P.M. or 4:00 P.M. The secretary excused herself to make a telephone call from the inner office area and it was believed that she may have contacted Eisenberg and was screening me. It was further believed that the secretary was being deceptive when she said that she had no other location, or home address where Eisenberg could be contacted. In line with my pretext no further in depth inquiries could be made.

On this date I also proceeded to the alleged residence of Gerald Pechenuk, located at 3817 N. Lawndale Avenue, Chicago, Illinois. The subject's name was posted for the second floor apartment, but no response was received.

Upon concluding the above efforts I returned to the Chicago office and discontinued upon preparing and rendering this report.

7/7/81
 cb

P.O. Box 24
River Forest, IL 60305



Mr. Charles N. Steele
* Federal Election Commission
Washington, D.C. 20463

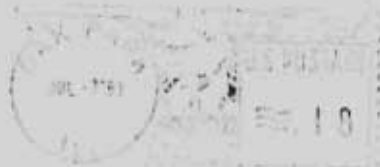
Personal & Confidential

01 JUL 17 PM 12:02

3010:70:71

8 3 0 4 0 3 7 0 7 5

P.O. Box 24
River Forest, Ill. 60305



Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Personal & Confidential

81 JUL 10 AM: 23

INVOICE

PINKERTON'S, INC.

1010 LAKE STREET
OAK PARK, IL 60301
TEL. 312-383-4000
CHI TEL. 312-626-3400

UNIFORMED GUARDS
APPLICANT INVESTIGATIONS
SECURITY SURVEYS & PLANNING
SURVEILLANCES & INVESTIGATIONS
ELECTRONIC PROTECTIVE DEVICES

OFFICES IN PRINCIPAL CITIES IN
UNITED STATES AND CANADA
MEMBER OF THE LIGUE
INTERNATIONALE DES SOCIETES
DE SURVEILLANCE

FEDERAL ELECTION COMMISSION

TO:

Mr. Charles N. Steele
& Above
Washington, D.C. 20463

I-261

INVOICE NUMBER

W-629

JOURNAL NUMBER

July 1981

INVOICE DATE

TERMS: NET - PAYABLE UPON RECEIPT OF INVOICE

FOR SERVICES RENDERED RE: SERVE SUBPOENAS

D.D.N.	July 2, 8	4½ Hours @25.00	\$112.50
		Expenses:	5.75
			<u>\$118.25</u>

TOTAL:

PREVIOUS BALANCE:

GRAND TOTAL:

\$118.25

8/7/81

P.O. Box 24
River Forest, IL 60305



Mr. Charles N. Steele
& Federal Election Commission
Washington, D.C. 20463

Personal & Confidential

81 AUG 12 AM: 49

83040370177



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 19, 1981

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Illinois 60660

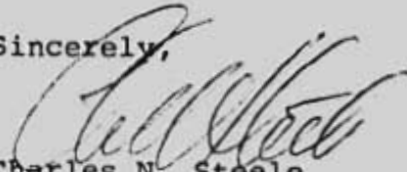
RE: MUR 1352(81)

Dear Mr. Eisenberg:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Friday, July 17, 1981, at 2:00 p.m. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena


Letter to Elliot R. Eisenberg
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles A. Steele
General Counsel

Enclosure

Subpoena

33040370180



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Eisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

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


SUBPOENA

TO: Elliot Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

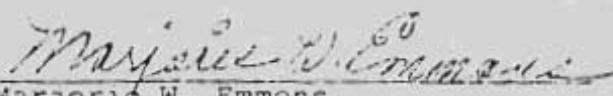
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 10:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-623-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

Gerald Pechenuk
3817 North Lawndale
Chicago, Illinois 60618

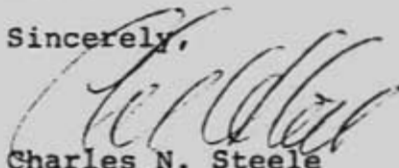
RE: MUR 1352(81)

Dear Mr. Pechenuk:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Friday, July 17, 1981, at noon. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

RE: MUR 1352(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(2)(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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Gerald Pochenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$20.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll-free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Stancie
General Counsel

Enclosure

Subpoena

13749370133

FEDERAL ELECTION COMMISSION
1375 K Street, N.W.
Washington, D.C. 20463


SUBPOENA

TO: Gerald Pecchenuk
6344 Southwood, IN
Clayton, Mo. 63105

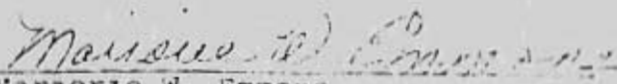
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 10:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogen (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Mayer Morganroth

Attorney at Law

Telephone (313) 355-3084

GCC# 4862

10011 11:21
Suite 314-B Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075

June 9, 1981

Mr. Robert Bogin
Federal Election Commission
1325 K Street
Washington D.C. 20463

Re: Robert Cole & Gerald Rose

Dear Sirs:

Please be advised that I have been retained by
Robert Cole and Gerald Rose to represent them at the
depositions on July 17, 1981, at 10:00 A.M. in regard
to the Commissions' depositions and inquiry.

Very truly yours,

Mayer Morganroth

Mayer Morganroth

MM/be

1 JUN 11 11:07

② *Mayer Morganroth*
② *Attorney at Law*
Suite 314-B Heritage Plaza
24901 Northwestern Highway
Southfield, Michigan 48075



Mr. Robert Bogin
Federal Election Commission
1325 K Street
Washington D.C. 20463

PINKERTON'S, INC.

CCC#4882

Client		Character of Case	
Federal Election Committee		Serve Subpoenas	
Office of Origin	File No.	Status	
Chicago	CHI-W629	Final	
Reporting Office	Report Made By	Date of Report	
Chicago	SPS	Monday, June 8, 1981	

SPS

Subpoena : Elliot Eisenburg

Commenced: 10:00 A.M.

Discontinued: 6:30 P.M.

Received details and departed the Chicago office enroute to 116 S. Michigan to locate Elliot Eisenburg.

10:30 A.M.

Arrived at the above location and proceeded to the ninth (9th) floor where the Energy and Fusion Foundation was located. The receptionist who can be described as a:

W/F, 32 years of age, 5'5",
115 lbs., light complexion,
medium build, with long brown
hair

asked if she could help me with anything. I asked to speak with Mr. Eisenburg, but was told that he was not in the office at that time. The receptionist informed me that he worked out of the office most of the time.

10:44 P.M.

I left the ninth (9th) floor and stayed at the ground level of 116 S. Michigan.

1:30 P.M.

I again walked back to Energy and Fusion Foundation and was told that Mr. Eisenburg would probably not be back until late afternoon. I returned to the ground level of the building.

5:16 P.M.

For the last time I returned to Mr. Eisenburg's office, but he still had not come into work.

5:28 P.M.

Departed the area enroute to the Chicago office.

PINKERTON'S, INC.

Client		Character of Case	
Federal Election Committee		Serve Subpoenas	
Office of Origin	File No.	Status	
Chicago	CHI-W629	Final	
Reporting Office	Report Made By	Date of Report	
Chicago	SPS	Monday, June 8, 1981	

SPS

Subpoena : Elliot Eisenburg

Commenced: 10:00 A.M.

Discontinued: 6:30 P.M.

Received details and departed the Chicago office enroute to 116 S. Michigan to locate Elliot Eisenburg.

10:30 A.M.

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W/F, 32 years of age, 5'5",
115 lbs., light complexion,
medium build, with long brown
hair

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5:16 P.M.

For the last time I returned to Mr. Eisenburg's office, but he still had not come into work.

5:28 P.M.

Departed the area enroute to the Chicago office.

P.O. Box 24
River Forest, Ill. 60305

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

31 JUN 1981 15:15

RECEIVED

Personal & Confidential



31 JUN 1981 15:58

3040370191

INVOICE

PINKERTON'S, INC.

1010 LAKE STREET
OAK PARK, IL 60301
TEL 312-383-4000
CHI TEL 312-626-3400

UNIFORMED GUARDS
APPLICANT INVESTIGATIONS
SECURITY SURVEYS & PLANNING
SURVEILLANCE & INVESTIGATIONS
ELECTRONIC PROTECTIVE DEVICES

OFFICES IN PRINCIPAL CITIES IN
UNITED STATES AND CANADA;
MEMBER OF THE LIGUE
INTERNATIONALE DES SOCIETES
DE SURVEILLANCE

FEDERAL ELECTION COMMISSION

Mr. Charles N. Steele
& Above
Washington, D.C. 20463

TO:

I-251

INVOICE NUMBER

W-629

JOURNAL NUMBER

June 1981

INVOICE DATE

TERMS: NET-PAYABLE UPON RECEIPT OF INVOICE

FOR SERVICES RENDERED RE: SERVE SUBPOENA -GERALD PECHENUK

STL
ABL

6/1/81

2 Hours @25.00

\$50.00

Expenses:

7.00

\$57.00

7/10/81

TOTAL:

PREVIOUS BALANCE:

GRAND TOTAL: \$57.00

INVOICE

PINKERTON'S, INC.

1010 LAKE STREET
OAK PARK, IL 60301
TEL. 312-383-4000
CHI TEL. 312-626-3400

UNIFORMED GUARDS
APPLICANT INVESTIGATIONS
SECURITY SURVEYS & PLANNING
SURVEILLANCES & INVESTIGATIONS
ELECTRONIC PROTECTIVE DEVICES

OFFICES IN PRINCIPAL CITIES IN
UNITED STATES AND CANADA;
MEMBER OF THE LEAGUE
INTERNATIONALE DES SOCIETES
DE SURVEILLANCE

FEDERAL ELECTION COMMISSION

Mr. Charles N. Steele
& Above
Washington, D.C. 20463

TO:

I-251

INVOICE NUMBER

W-629

JOURNAL NUMBER

June 1981

INVOICE DATE

TERMS: NET-PAYABLE UPON RECEIPT OF INVOICE

FOR SERVICES RENDERED RE: SERVE SUBPOENA -GERALD PECHENUK

STL
ABL

6/1/81

2 Hours @25.00

\$50.00

Expenses:

7.00

\$57.00

7/10/81

TOTAL:

PREVIOUS BALANCE:

GRAND TOTAL:

\$57.00

UNIFORMED GUARDS
APPLICANT INVESTIGATIONS
SECURITY SURVEYS & PLANNING
SURVEILLANCES & INVESTIGATIONS
PATROL & INSPECTION
INVENTORY SERVICES

Invoice
Pinkerton's, Inc.

P. O. Box 62
Ellicott Square Station
Buffalo, New York 14205

OFFICES IN PRINCIPAL CITIES IN
UNITED STATES AND CANADA
MEMBER OF THE LIGUE
INTERNATIONALE DES SOCIÉTÉS
DE SURVEILLANCE

Mer 1332
Gcc # 4977

BUFFALO
BRANCH



020-0727
JOURNAL NUMBER

02603
INVOICE NUMBER

6/08/81
INVOICE DATE

**FEDERAL ELECTION COMMISSION
C N STEELE-GNRL COUNSEL**

TO

WASHINGTON

DC 20463

TERMS: NET-PAYABLE UPON RECEIPT OF INVOICE

LINE	SERVICES RENDERED	UNITS	RATE	AMOUNT
01	SERVE SUBPEONAS			
02	5/03/81 - 5/31/81 HOURLY	16.00	17.50	280.00
03	EXPENSES			4.40
	WDK May 3 4 hrs			
	4 6 "			
	5 4 "			
	27 2 "			

TOTAL: \$ 284.40

PREVIOUS BALANCE: \$ 0.00

TOTAL DUE \$ 284.40

PINKERTON'S, INC.

Client		Character of Case	
Federal Election Commission		Serve Subpoena	
Office of Origin	File No.	Status	
Chicago	W-629	Final	
Reporting Office	Report Made By	Date of Report	
St. Louis	ABL	Monday, June 1, 1981	

This investigator was assigned to deliver the enclosed subpoena to Gerald Pechenuk thought to reside at 6344 Southwood in Clayton, Mo. It was determined that Pechenuk no longer lives at this address, not since December, 1979, according to the National Real Estate Company managing the apartments.

The 1980 telephone directory listed Gerald Pechenuk as living at 5639 S. Kingshighway in St. Louis City. An effort was made to deliver the subpoena to this address, but this investigator could not locate Pechenuk as a resident. The Roberts Realty Company who manage the Kingshighway apartments stated that Pechenuk no longer lived there, at least not in an apartment under his name. The Southwest Station Post Office which services the Kingshighway address has no forwarding address for Pechenuk and stated that mail for him is still delivered to the Kingshighway address.

A credit check with local financial and credit sources revealed that Pechenuk's most current address on file is the Kingshighway address. Also his Social Security Number is [REDACTED]. There have been credit inquiries as recently as April 25, 1981 in the St. Louis area. Additional efforts to locate Pechenuk could be made utilizing his established credit record in the St. Louis area.

FINAL

92:4d 52400 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 20, 1981

Gerald Pechenuk
3817 North Lawndale
Chicago, Illinois 60618

RE: MUR 1352(81)

Dear Mr. Pechenuk:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 9:00 a.m. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

RE: MUR 1352(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

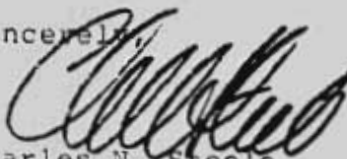
Letter to Gerald Pechenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

137403700

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

SUBPOENA

TO: Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

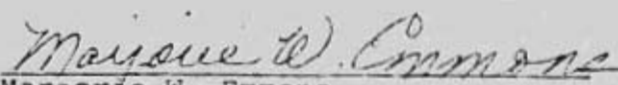
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 10:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

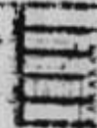
ATTEST:


Marjorie W. Emmons
Secretary to the Commission

P.O. Box 24
River Forest, IL 60305



CHANGE OF ADDRESS
KITS MAKE YOUR
MOVE COMPLETE



Mr. Charles N. Steele
% Federal Election Commission
Washington, D.C. 20463

Personal & Confidential

3301070000

60074888

PINKERTON'S, INC.

Client		Character of Case	
Federal Election Commission		Serve Subpoena: 37	
Office of Origin	File No.	Status	
Chicago	CHI-W629	Continuing	
Reporting Office	Report Made By	Date of Report	
Chicago	PJS	Friday, May 29, 1981	

I received details and departed Chicago office enroute to various locations for subpoena service. First attempt was Kirby Ashley, 5637 N. Glenwood in Chicago. On arrival I found that there was no bell listing for subject so I began checking residents. The first person I attempted to interview was the lady on the first floor, but she spoke no English at all. Finally I got her to call her son down from the second floor and I found that his name is Mr. Mirko and he is the landlord.

He too spoke broken, but understandable English. Mr. Mirko was very co-operative, but insisted that he never heard of a Kirby Ashley. I then asked him about the second subject Therese Seider. Mr. Mirko said that Ms. Seider did live in his building on the third floor, but moved about a year ago when he refused to renew her lease. I asked if she had caused him any problems and Mr. Mirko said that the reason he refused to let her stay was that she constantly had all kinds of people living with her and coming and going at all hours of the night and day. Kirby Ashley was probably one of those people. Mr. Mirko said that he did not know exactly where Ms. Seider moved to, but he did know it is in Wisconsin.

The next subject was Eliot Eisenberg at 5611 N. Glenwood, Chicago. This is a six flat building and again as in the previous two, Mr. Eisenberg was not listed as a resident of the building. On my first attempt I spoke to Messrs. Anderson and Chelton. Both claim they have never heard of subject. On several subsequent attempts I have spoken to everyone in the entire building and got the same story from each of them. This building is loaded with transient people from 21 to 45 years of age; all give the appearance and impression that they are lying and all seem to be typical political type activists. They all seem to have a cautious and yet belligerent attitude when being questioned. Finally, Mr. Eisenberg was located, or at least known to be working at Fusion Energy Foundation at 116 S. Michigan Avenue, phone (312) 782-2666. However, 12 attempts were made, 9 by myself and 3 by an associate to see Mr. Eisenberg at his work address and he is never there. Everyone is so secretive that it is difficult to tell if subject is there and hiding, or if he is as they say in and out all the time. Everyone refused to say what subject does or anything else

about him. A very young, or late middle-aged intellectual, snobbish type female would probably have the best chance of drawing this subject out on a pretext. In any case I feel we will need an accurate description or something more to go on. I would not at all be shocked to find out that in the course of all my trips, I may have spoken to subject in person while he was using as alias.

The next attempt was on Sherri Waffle at 4728 N. Albany in Chicago. This is a four flat building and the name "Waffle" does appear on a bell along with 5 other names for one apartment. I spoke to Messrs. Bettag, Sloan and Brubaker. All claim that Sherri Waffle is living in Michigan, but none will say where. There is no doubt in my mind that they are not telling the truth however, I have made 2 trips back to speak to people on other floors who have said they don't know Ms. Waffle, but admitted that there are alot of people living in that apartment.

I then visited 4823 N. Lawndale in an attempt to contact Melvin Klenetsky. I spoke to Mrs. Woods who claims she has lived at that address for 33 years and has never heard of subject. She seemed to be truthful and very willing to co-operate. In fact she suggested that I check across the street at 4822, which she claimed housed alot of very "radical" type people always running around asking for money and carrying signs. I did check it out along with the houses on either side, on both sides of the street. No one seemed to have ever heard of subject.

The last subpoena was for a Robert Cole at 4119 W. Belle Plaine. Suprisingly, Robert Cole and his wife do live at this address and are registered on the bell and don't seem to be hiding from anyone. Mrs. Cole answered the door and seemed both suspicious, and frightened when I told her I had to speak to her husband Robert. She tried to persuade me to leave the papers with her because her husband was sick and resting. However, when I insisted on talking to him personally she went to the bedroom and shortly thereafter he came out. Mr. Cole seemed to be aware of what the subpoena ordered and yet a bit confused at the same time. He seemed to be a "follower type" who without direction from his leader would be very honest and truthful. Without knowing the motives or goals of the overall investigation, I was reluctant to interrogate Mr. Coles so I stuck to the simple and obvious questions regarding his knowledge of the existance of the other subjects as real living people. Each name I mentioned to him, he said yes he did know the person in question. I did not press in fear that I may be forewarning him of questions to be asked at a later date.

SYNOPSIS AND RECOMMENDATIONS

Based on the information only suggested by the subpoena issued and the surroundings of the subjects in question, it is the opinion of this investigator that all of the individuals involved are political (paid or volunteer) activists who were, and possibly are involved in fund raising of an illegal nature and are fully aware of the consequences of their acts. They therefore,

do not under any circumstances want to answer the questions of any probing committee of the establishment. The one exception seems to be Mr. Robert Cole who is still a little confused. He may or may not realize what laundering illegal campaign donations means at this point but, I think if he were approached or questioned on an intelligent soft sell, hard leadership basis he would be willing to volunteer some very valuable information vital to the successful completion of this investigation. There is no doubt that given the proper time and tools each of the individuals can be located and properly served with a subpoena. None of these people are very professional at real deception however, they thoroughly enjoy the game they are right now playing. If given the proper descriptions of individuals, which could most likely be obtained from Mr. Coles and the threat of prosecution under obstruction of legal service laws, I feel that almost everyone of the people interviewed originally would open up new doorways leading to a successful service of all subjects involved. No further investigation or attempts will be forthcoming pending instructions from client.

6/9/81
cb



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Kirby Ashley
5637 North Glenwood
Chicago, Illinois 60660

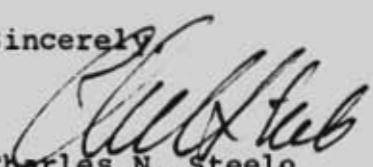
Re: MUR 1352(81)

Dear Mr. Ashley:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 1:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Ashley:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Kirby Ashley
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles L. Steele
General Counsel

Enclosure

Subpoena

9374037004



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Therese M. Seiler
5637 N. Glenwood
Chicago, Illinois 60660

Re: MUR 1352(81)

Dear Ms. Seiler:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 2:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele", is written over the word "Sincerely,".

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese Seiler
260 E. High St.
Manchester, N.H.

RE: MUR 1352(81)

Dear Ms. Seiler:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

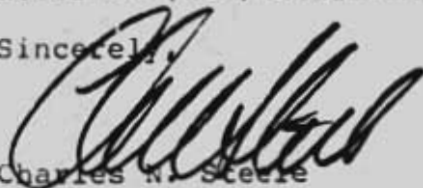
Letter to Therese Seiler
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Subpoena

130103701

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


SUBPOENA

TO: Therese Seiler
5637 N. Glenwood
Chicago, ILL. 60660

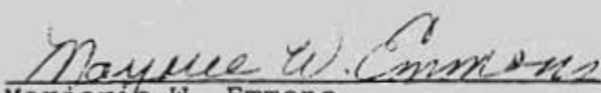
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 9:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarvey
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Shari D. Waffle
4728 North Albany Street
Chicago, Illinois 60625

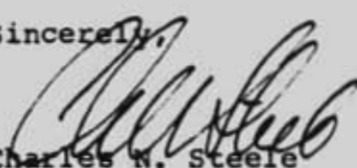
Re: MUR 1352(81)

Dear Ms. Waffle:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles W. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

RE: MUR 1352(81)

Dear Ms. Waffle:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Shari D. Waffle
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

37103701

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

SUBPOENA

TO: Shari D. Waffle
4728 North Albany Street
Chicago, ILL. 60625

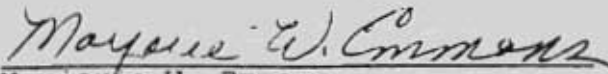
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 9:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1981

Melvin Klenetsky
4823 North Lawndale
Chicago, Illinois 60618

Re: MUR 1352(81)

Dear Mr. Klenetsky:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 12:00 (noon). Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. N. Steele", is written over the word "Sincerely,".

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: MUR 1352(81)

Dear Mr. Klenetsky:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 4:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

01007010

Subpoena

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

SUBPOENA

TO: Melvin Klenetsky
4823 North Lawndale
Chicago, ILL. 60618

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Illinois 60660

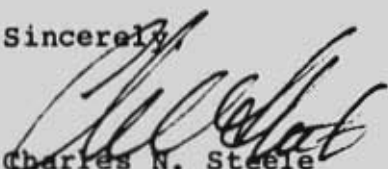
Re: MUR 1352(81)

Dear Mr. Eisenberg:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Eisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Elliot R. Eisenberg
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

0304067022

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


SUBPOENA

TO: Elliot Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

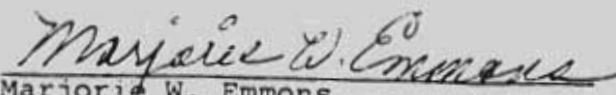
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 10:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

P.O. Box 24
River Forest, IL 60305

0304037022

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Personal & Confidential

STATE OF NEW JERSEY
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF GAMING ENFORCEMENT
CN 047
TRENTON, NEW JERSEY 08625



Mr. Charles Steele
Office of General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 28, 1981

MEMORANDUM

TO: The file
FROM: Beverly Kramer
SUBJECT: MUR 1352

Pursuant to the Commission's directive of August 8, 1980, the Audit Division analyzed the entire CFL submission with respect to money orders and cashiers checks. In addition, the Audit Division performed a 100% review of CFL contributions in the threshold states of Maryland, Virginia, Ohio, Oregon and Missouri. The findings of the Audit Division were referred to the Office of General Counsel in a February 27, 1981 memorandum entitled "Citizens For LaRouche - Matching Funds Submissions."

Based on the General Counsel's review of audit findings, we have determined to incorporate the attached exhibits into MUR 1352

1374917000

3 2 1 2 4 7 2 2 7
ILLINOIS MONEY ORDERS

<u>Exhibit Number</u>	<u>Contributor - Occupation</u>	<u>Issuing Institution</u>	<u>Serial Number</u>	<u>Date of Instrument</u>	<u>Amount</u>	<u>Amount Applied Towards Eligibility</u>
C(1)	a. Mark McGrath - Shipping Clerk	Des Plaines National Bank	080662	10-20-79	\$ 50.00	\$50.00
	b. same	same	080946	11-03-79	15.00	N/A
	c. same	same	081233	11-15-79	100.00	Rejected (\$100)
	d. same	same	082409	12-01-79	100.00	N/A
				Total		<u>\$50.00</u>

C(1)

The style of handwriting completing the payee lines of two of these instruments (a. and d.) is similar to the handwriting associated with the Almagamated Trust and Continental Bank instruments referred to the Office of General Counsel in the Letter of Threshold Audit Findings on 6/13/80. The items referred on 6/13/80 have been excluded from this review. Further, the handwriting of these two instruments is different from the remaining two instruments from the named contributor (b. and c.) and suggests they may have been completed by a different hand. The contributor is also listed in the 1976 LaRouche submission.

EXHIBIT C

12-4-79, 1-1



MAIN BANK
8 LEE STREET



AUTO BANK
610 LEE STREET

DES PLAINES
National BANK

678 LEE STREET • DES PLAINES
(312) 827-1121

No. 082409

70-2282
719

Dec 1 19 79

AM. 30.00

PAY TO THE
ORDER OF

Citizens for LaRouche

PAID 10092

NOT VALID OVER \$250.00
PERSONAL MONEY ORDER

SIGNATURE

Mark McWhorter

ADDRESS

586 N. 7th Ave

⑈082409⑈ ⑆0719⑈2282⑆ 5100900028⑈

00002 1L

3 3 7 4 0 5 7 0 2 1

New York Money Orders

<u>Exhibit Number</u>	<u>Contributor - Occupation</u>	<u>Issuing Institution</u>	<u>Serial Number</u>	<u>Date of Instrument</u>	<u>Amount</u>	<u>Amount Applied Towards Eligibility</u>
G(1)	a. John Scialdone - Technician	Marine Midland Bank	8849764	02/16/79	\$ 50.00	N/A
	b. same	Citibank	016990618	03/12/79	50.00	N/A
G(2)	Christine O'Connor - Unemployed	The Bowery Savings Bank	401635	02/13/79	100.00	N/A
G(3)	Michael Leppig - Unemployed	The Bowery Savings Bank	401636	02/13/79	100.00	N/A
G(4)	a. Paul Kacpizak - Salesman	M & T Bank	1773826	12/10/79	60.00	N/A
	b. same	Erie Savings Bank	565910	11/21/79	100.00	N/A
G(5)	Ernest Schapiro - Doctor	same	565911	11/21/79	100.00	N/A
G(6)	Matt Guice - Unemployed	M & T Bank	1877170	01/12/80	150.00	N/A
G(7)	Felix A. Iavarone - Unknown	U. S. Post Office	25459552427	05/24/80	70.00	N/A
G(8)	Andrew H. Delehanty - Unknown	U.S. Post Office	25459552607	05/28/80	20.00	N/A

G(1)

The money orders bearing the contributor name of John Scialdone are completed in part, in different handwriting styles suggesting they may have been completed by two different hands. Differences noted between the instruments were:

- the use of a written "z" in Citizens on one instrument and a printed "z" in the other.
- the use of "r" in For which is well shaped and capitalized in one instrument and exaggerated to resemble letter "v" printed in lower case on the other instrument.
- the number "2" on one instrument has a loop at the base of the number, the other has a straight line.

G(2) & (3)

The instruments are Tellers Checks, apparently completed by a bank teller. However, the instruments are consecutively numbered, bear the same date and amount. Christine O'Connor G(2) worked for CFL during its current campaign. Michael Leppig G(3) was listed in the 1976 LaRouche submission.

G(4) (5) & (6)

The style of handwriting completing the payee line of the four instruments is similar to the extent that the instruments may have been completed by the same hand. Characteristics common among the instruments are:

- the capitalized printing of "LA" in LaRouche followed by the lower case printing of "rouche".
- the "R" in For and LaRouche is printed in the same basic style.

Contributors Paul Kacpizak and Ernest Schapiro apparently reside at 28 Ripley Place Buffalo, NY, a residence known to house at least four LaRouche contributors. Paul Kacpizak is identified on instrument G(4)a and other supporting documentation as a CFL representative. Further, instrument G(4)a is annotated "cash raised at December 9th fundraiser Bflo (Buffalo) NY" which suggest the money order represents funds collected from other individuals at a Buffalo fundraising event, (which, in our opinion renders the "contribution" unmatchable (see 11 C.F.R. 9034.3(e)). In addition, instruments G(4) and G(5) are consecutively numbered, bear the same date, the same amount, and were deposited by CFL on the same day (11/26/79). The contributor noted in G(6) also donated a money order which had been referred to the Office of General Counsel on 6/13/80 (see referral (6/13/80) Exhibit F1, 2, and 3).

G(7) & (8)

The style of handwriting completing the payee line of the instruments appears to have been written by the same hand. Further, there are subtle indications that the purchaser information (name and address) may have been completed by the same hand. Common handwriting characteristics prevalent on both instruments are:

- the "C" in Citizens appears with a slash through the letter.
- the "F" in For is written with the bar or slash appearing on the right side of the letter.
- the "La" in LaRouche is connected in a cursive handwriting style while other letters on the instrument are printed.
- the "A" in Andrew H. Delehanty and the "A" in Feliz A Iavarone/Albany are similar in form.
- the words "campaign contribution" appear at the bottom of both instruments in a similar printing style.

Other characteristics associated with the instruments are that they were purchased within a four day period, at the same U. S. Post Office, and bear the initials "NY" (apparently New York) in the lower left corner.

④ a

12-12-79, 1-1

HOME ADDRESS



Manufacturers and Traders Trust Company
BUFFALO, N. Y. 14202

NO. 1773826

$$\frac{10-4}{220}$$

~~PERSONAL MONEY ORDER~~

Dec 21 - 1964

1979

PAY TO THE ORDER OF Citizens For Canavache

NOT VALID FOR MORE THAN \$20.25

SMS BANK 60 days 00cts

CASH raised SAT Dec 9th
Fundraiser BFUG NY

Paul Kaczmarek

SIGNATURE

MONEY ORDER

28 Ripley PL

ADDRESS

773826 10220000451

56-018 511

CFL

Representative

00002

NY

12-1-74, 1-1

ERIE SAVINGS BANK

BUFFALO NEW YORK

No. 565910

SAVINGS BANK MONEY ORDER

PAY TO THE ORDER OF CITIZENS FOR LAPOUCHE

NOV. 21 79

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

ERIE SVGS. BANK 10000000

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS (\$500.)

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

Paul Ripler
REMITTER'S SIGNATURE
28 Ripler
ADDRESS

42

⑈05565910⑈ ⑆026007948⑆ 00241⑈0421⑈

00001

ERIE SAVINGS BANK

BUFFALO NEW YORK

No. 565917

SAVINGS BANK MONEY ORDER

PAY TO THE ORDER OF CITIZENS FOR LAPOUCHE

NOV. 21 79

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

ERIE SVGS. BANK 10000000

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS (\$500.)

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

Ernest Schypin
REMITTER'S SIGNATURE
28 Ripler PL
ADDRESS

42

⑈05565911⑈ ⑆026007948⑆ 00241⑈0421⑈

NY 00001

Exhibit G

00003

1-1 NY

1-15-80

DATE

DEPOSIT CODE

M&T BANK

JAN 15 1980

NO. 1877170

BUFFALO, N.Y. 14202

PERSONAL MONEY ORDER

JANUARY 15 1980

TO THE ORDER OF

CITIZENS FOR LAROCHE

NOT VALID FOR MORE THAN \$500.00

M&T BANK PRODUCTS

MONEY ORDER

Norma

SIGNATURE

298-NORMA

Buffalo, New York

DATE

1-15-80

DEPOSIT CODE

1-11-80

CITIZENS FOR LAROCHE

P.O. Box 976, Radio City Station

New York, N.Y. 10019

(212) 247-3227

Name of contributor MARTI GALE

Address 298-NORMA

City BUFFALO State NY Zip 14213

Amt. of contribution 150 Date 1-12-80

Contributor's occupation unemployed

Place of employment

Address

CFL Representative PAUL KAIPRAK

Missouri Checks

HANDWRITING PATTERNS

L(26)	a.	Steven Carr - Unemployed	Tower Grove Bank	17-79	10/09/79	250.00	250.00
	b.	Same	Same	18-79	12/05/79	200.00	N/A
L(27)	a.	Don J. Carr - Manager	American Nat'l Bank	79A-1	03/04/79	1,000.00	N/A
	b.	Same	Same	79A-121	10/24/79	25.00	25.00
						Total	<u>\$2,205.00</u>

A total of 205 checks, totaling approximately \$13,407 were examined for any patterns or irregularities which may warrant further analysis. Fifty-three percent of the instruments examined had check numbers ranging from 0 to 200, suggesting the use of a starter series of checks for relatively new or infrequently used accounts. A discussion of any patterns or irregularities observed during the review follows:

L(1) thru (15)

The instruments from these 15 contributors bear the initials "CGO", "chgo", or the written word "Chicago" in the lower left corner of the check. While a number of Missouri instruments examined were annotated with the initials or full name of a city, generally, the city was St. Louis. In view of the Chicago notations being present on Missouri instruments and the city (Chicago) is a focal point of money order irregularities developed in the Threshold Audit, further review of these contributions is warranted. In addition, instrument L(1) has a notation "Donation for paer CGO", instruments L(7) a. and b. appear to be completed by a different hand. Finally, instruments L(14) a, b, and c appear to have three slightly different revisions of the contributor's signature.

L(16) thru (21)

The notations of these instruments suggest that the contributions may have been exchanged for books and other materials. The contributions raise questions of the donative intent of the contributors and/or the actual source of the funds (see discussion K(1) thru (7) - Maryland checks). With further analysis via depositions or confirmations, the contributions may prove to be non-matchable pursuant to Section 9034.3(j) and (k) of the Matching Fund Regulations (see MUR 1186).

L(22)

It is apparent that the contributions were made from a relatively new or infrequently used account. The initials "Cgo" (apparently Chicago) are written on the memo line of check #119 (instrument L(22)e). Additionally, it should be noted that the contributor also made a donation with a money order from the Continental Bank (Chicago, IL) which had been referred to Office of General Counsel on 6/13/80 (see MUR 1352).

MISSOURI CHECKS

Exhibit Number	Contributor - Occupation	1 3 0 4 0 Depository	0 7 0 Check Number	0 3 Date	Amount	Amount Applied Towards Eligibility
CHECK NOTATIONS						
L(1)	Bertha Bax - Unknown	Meta State Bank	2608	06/05/80	\$ 25.00	N/A
L(2)	a. Catherine D. Blackmon Mgr./Housewife	Harvester Nat'l Bank	291	10/16/79	50.00	\$ 50.00
	b. Same	Same	339	01/02/80	125.00	N/A
	c. Same	Same	1151	09/22/79	200.00	200.00
	d. Glen A. Blackmon	Same	1182	10/18/79	25.00	N/A
	e. Same	Same	1193	11/01/79	10.00	N/A
L(3)	Lucille M. Elliott - Unknown	Hampton Metro Bank	2033	06/02/80	10.00	N/A
L(4)	George Ham - Unknown	Mercantile Bank	690	07/02/80	30.00	N/A
L(5)	a. David R. Hoffman - Unemployed	Commerce Bank	120	09/23/79	150.00	Rejected (\$150)
	b. Elizabeth G. Hoffman Housewife	Continental Bank	405	11/30/79	20.00	N/A
L(6)	Terecia Jackson - Unknown	Eureka Bank	1678	01/28/80	10.00	N/A
L(7)	a. Beth Jacobs - Housewife	American Nat'l Bank	708	09/24/79	65.00	65.00
	b. Same	Same	750	11/02/79	25.00	N/A
L(8)	Robert Kent Lewis - Unknown	Chrisman/Sawyer Bank	419	01/27/79	5.00	N/A
L(9)	Dennis McConkey - Unknown	Mid-America Bank	987	12/21/79	125.00	N/A
L(10)	Robert L. Morris - Unknown	Lindell Trust Co.	348	10/19/79	15.00	15.00
L(11)	Thomas R. Pierce - Unemployed	Central Bank Clayton	106	09/23/79	205.00	205.00
L(12)	Mike Rad - Unknown	Eureka Bank	327	10/26/79	25.00	25.00
L(13)	a. Barbara B. Scanlon - Secretary	Commerce Bank	801	09/22/79	50.00	50.00
	b. Leo F. Scanlon Unemployed	Same	802	09/27/79	235.00	235.00
L(14)	a. Paul Schmitz - Computer Programmer	Jefferson-Gravois Bank	107	11/02/79	100.00	N/A
	b. Same	Same	119	01/15/80	150.00	N/A
	c. Same	Same	120	01/31/80	150.00	N/A
L(15)	G. A. Vogt - Manager	Mercantile Bank	361	09/21/79	35.00	35.00

Exhibit L

①

HENRY F. BAX BERTHA BAX PHONE 493-2332 ST. ELIZABETH, MO. 65075		2608
PAY TO THE ORDER OF <u>C. J. Laroche</u>		6/5 1950
<u>Twenty five dollars & no/100</u>		25 00
MEMBER 7-1-50		80-1474 815
META STATE BANK META, MISSOURI		DOLLARS
<u>Donation for paper 660</u>		<u>Mr. Henry F. Bax</u>
⑆081514748⑆		⑆0057 8⑆

00013

0
1
2
3
7
0
0
3
1

⑦a

TOM S. OR BETH B. JACOBS
5639-A S. KINGSHIGHWAY
ST. LOUIS, MO 63109

SEP 28 1979 708

Sept 24 1979 4-128
810

Pay to the Order of Citizens for LeRouche \$ 65.00
xx
Dollars

AMERICAN NATIONAL BANK
6639 south kingshighway
saint louis, missouri 63109

For Beth B. Jacobs

⑈081001264⑈ ⑈1 36 373 8⑈

00001

T

⑦b

TOM S. OR BETH B. JACOBS
5639-A S. KINGSHIGHWAY
ST. LOUIS, MO 63109

NOV 07 1979 750

11-2 1979 4-128
810

Pay to the Order of Citizens for LeRouche \$ 25.00
Twenty-five and 00/100
Dollars

AMERICAN NATIONAL BANK
6639 south kingshighway
saint louis, missouri 63109

For CGO Beth B. Jacobs

⑈081001264⑈ ⑈1 36 373 8⑈

00001

T



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 20, 1981

Earl Konecki
Pinkerton's Incorporated
1000 Lake Street
Oak Park, Illinois 60301

RE: MUR 1352(81)

Dear Mr. Konecki:

As you are aware, the Office of General Counsel of the Federal Election Commission retained Pinkerton's Incorporated to serve six subpoenas in connection with the above-reference matter. Please refer to our letter of April 29, 1981. Enclosed please find an additional subpoena that this Office requests that you serve upon Gerald Pechenuk. This Office authorizes you to spend no more than two hours time to effect service or to obtain a forwarding address for this individual.

Please give periodic status reports to Robert Bogin
at (202) 523-4143.

Sincerely,

Charles N. Steele

Encl
2

REMARKS: <u>Order form 1, 2, and 3.</u> Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered..... <input type="checkbox"/> Show to whom, date and address of delivery..... <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered..... <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.	
(CONSULT POSTMASTER FOR FEES)	
2. ARTICLES REFERRED TO: <u>EARL BONECKI</u> <u>Pinkerton's Incorporated</u> <u>1000 Lake Street</u> <u>Rock Hill, S.C. 29730</u> <u>ARTICLE NO. 1000000000</u>	
POSTAGE PAID NO. <u>438334</u> POSTMASTER USE. <u>KEE85H</u> POSTAGE PAID NO.	3. ALWAYS SIGNATURE OF ADDRESSEE OR AGENT I have received the article described above. My name <u>Earl Bonecki</u> is described above. <u>Earl Bonecki</u> DATE OF DELIVERY MAY 26 1981
4. ADDRESSED RECEIPTS ONLY IF REQUESTED	
5. UNABLE TO DELIVER REASON:	



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 20, 1981

Gerald Pechenuk
3817 North Lawndale
Chicago, Illinois 60618

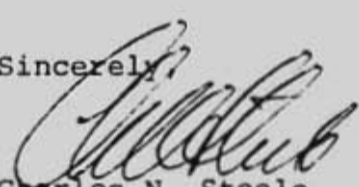
RE: MUR 1352(81)

Dear Mr. Pechenuk:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 9:00 a.m. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

RE: MUR 1352(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Gerald Pechenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

13740370:41

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


SUBPOENA

TO: Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

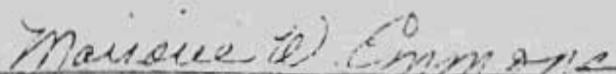
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 10:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1981

Bill Preble
Pinkerton's Incorporated
403 Main Street, Suite 420
Buffalo, New York 14203

Re: MUR 1352(81)

Dear Mr. Preble:

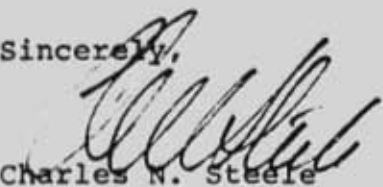
Pursuant to your conversation with Robert Bogin on April 23, 1981, please find enclosed subpoenas and letters to be served upon the following seven individuals:

Joyce Rubenstein
Linda Fisch
Jennifer Roe
Khushro Ghandhi
Matthew Guice
Roger Ham
Denise Ham

The Office of General Counsel is retaining Pinkerton's Incorporated for the purpose of serving the enclosed subpoenas on the above-named individuals. Alternatively, if any of these individuals have left the Buffalo area, Pinkerton's should obtain forwarding addresses for these individuals. It is our understanding that your firm charges \$17.50 per hour and 20¢ a mile to undertake an assignment of this kind. This Office authorizes you to spend no more than two hours time for any one of the seven individuals.

Please give periodic status reports to Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosures
2 sets of letters and subpoenas
for 7 individuals



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bill Preble
Pinkerton's Incorporated
403 Main Street, Suite 420
Buffalo, New York 14203

Re: MUR 1352(81)

Dear Mr. Preble:

Pursuant to your conversation with Robert Bogin on April 23, 1981, please find enclosed subpoenas and letters to be served upon the following seven individuals:

Joyce Rubenstein
Linda Fisch
Jennifer Roe
Khushro Ghandhi
Matthew Guice
Roger Ham
Denise Ham

The Office of General Counsel is retaining Pinkerton's Incorporated for the purpose of serving the enclosed subpoenas on the above-named individuals. Alternatively, if any of these individuals have left the Buffalo area, Pinkerton's should obtain forwarding addresses for these individuals. It is our understanding that your firm charges \$17.50 per hour and 20¢ a mile to undertake an assignment of this kind. This Office authorizes you to spend no more than two hours time for any one of the seven individuals.

Please give periodic status reports to Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
2 sets of letters and subpoenas
for 7 individuals

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Linda Fisch
421 Norwood Avenue
Buffalo, New York 14222

Re: MUR 1352(81)

Dear Ms. Fisch:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, which appears to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Linda Fisch
421 Norwood Avenue
Buffalo, New York 14222

Re: MUR 1352(81)

Dear Ms. Fisch:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Ms. Fisch:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

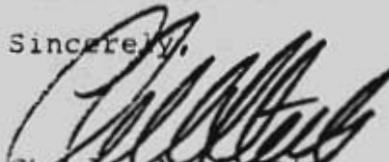
Letter to Linda Fisch
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

33010370149



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Matthew C. Guice
298 Normal Avenue
Buffalo, New York 14213

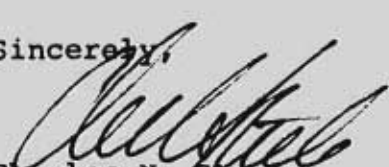
Re: MUR 1352(81)

Dear Mr. Guice:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 9:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Matthew C. Guice
298 Normal Avenue
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Mr. Guice:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 9:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mathew C. Guice
298 Normal Avenue
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Mr. Guice

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

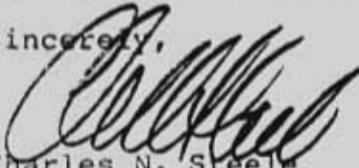
Letter to Mathew C. Guice
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Subpoena

1374037035

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

SUBPOENA

TO: Matthew Guice
298 Normal Avenue
Buffalo, N.Y. 14213


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You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3)
and (4), to appear at Room 914, Federal Building, 111 W. Huron
Street, Buffalo, N.Y. 14202, at 9:00 a.m. on May 1, 1981
and to give testimony under oath and other evidence, including
the furnishing of handwriting exemplars, in connection with an
investigation being undertaken by this Commission pursuant to
2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens
for LaRouche.

Any questions concerning this subpoena should be directed
to Robert I. Bogin (202-523-4000), the attorney assigned to this
matter.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Khushro Ghandhi
421 Norwood Avenue
Buffalo, New York 14222


Re: MUR 1352(81)

Dear Mr. Ghandhi:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 2:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Khushro Ghandhi
421 Norwood Avenue
Buffalo, New York 14222

Re: MUR 1352(81)

Dear Mr. Ghandhi:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 2:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Knushro Ghandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Mr. Ghandhi:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at noon has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Khushro Ghandhi
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

1374037035

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

SUBPOENA

TO: Khushro Ghandhi
421 Norwood Avenue
Buffalo, N.Y. 14222


13740057005
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at noon on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Roger Ham
143 Livingston Avenue
Buffalo, New York 14213

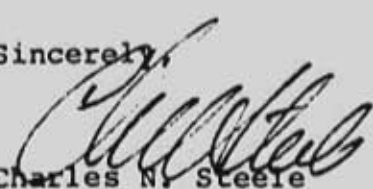
Re: MUR 1352(81)

Dear Mr. Ham:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 3:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Roger Ham
143 Livingston Avenue
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Mr. Ham:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 3:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Mr. Ham:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

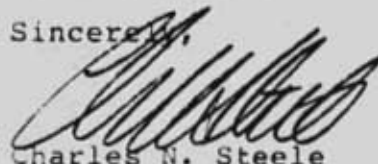
Letter to Roger Ham
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert — Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

0304037016

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


SUBPOENA

TO: Roger Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.


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You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room G-18, 40 Foley Square, New York, N.Y. at 1:00 p.m. on April 17, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Denise Ham
143 Livingston Avenue
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Ms. Ham:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 4:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Denise Ham
143 Livingston Avenue
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Ms. Ham:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 4:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Denise Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Ms. Ham:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

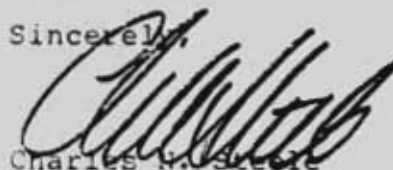
Letter to Denise Ham
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Sledge
General Counsel

Enclosure

Subpoena

337016

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


SUBPOENA

TO: Denise Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

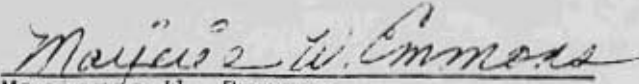
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room G-18, 40 Foley Square, New York, N.Y. 10007, at 2:00 p.m. on April 17, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Jennifer Roe
28 Ripley Place
Buffalo, New York 14213


Re: MUR 1352(81)

Dear Ms. Roe:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 11:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Jennifer Roe
28 Ripley Place
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Ms. Roe:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 11:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Ms. Roe:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

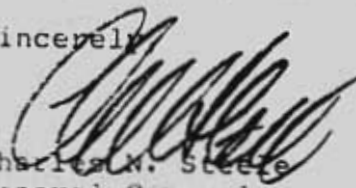
Letter to Jennifer Roe
Page Two
HUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles W. Steele
General Counsel

Enclosure

Subpoena

7304067007

1008707

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand on the 23rd day of March 1981.

John Warren McGarry
John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Joyce H. Rubinstein
163 14th Street
Buffalo, New York 14213


Re: MUR 1352(81)

Dear Ms. Rubinstein:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 12:00 noon. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joyce H. Rubinstein
163 14th Street
Buffalo, New York 14213

Re: MUR 1352(81)

Dear Ms. Rubinstein:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Wednesday, June 3, 1981, at 12:00 noon. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joyce H. Rubinstein
163 14th Street
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Ms. Rubinstein:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

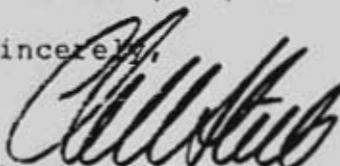
Letter to Joyce H. Rubinstein
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert — Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

830406737

03749377

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand on the 23rd day of March 1981.

John Warren McGarry
John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Earl Konecki
Pinkerton's Incorporated
1000 Lake Street
Oak Park, Illinois 60301

Re: MUR 1352(81)

Dear Mr. Konecki:

Pursuant to your conversation with Robert Bogin on April 23, 1981, please find enclosed subpoenas and letters to be served upon the following six individuals:

Elliot Eisenberg
Shari Waffle
Melvin Klenetsky
Robert Cole
Therese Seiler
Kirby Ashley

The Office of General Counsel is retaining Pinkerton's Incorporated for the purpose of serving the enclosed subpoenas on the above-named individuals. Alternatively, if any of these individuals have left the Chicago area, Pinkerton's should obtain forwarding addresses for these individuals. It is our understanding that your firm charges \$25.00 per hour and 20¢ a mile to undertake an assignment of this kind. This Office authorizes you to spend no more than two hours time for any one of the six individuals.

Please give periodic status reports to Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

2 sets of letters and subpoenas
for 6 individuals



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Earl Konecki
Pinkerton's Incorporated
1000 Lake Street
Oak Park, Illinois 60301

Re: MUR 1352(81)

Dear Mr. Konecki:

Pursuant to your conversation with Robert Bogin on April 23, 1981, please find enclosed subpoenas and letters to be served upon the following six individuals:

Elliot Eisenberg
Shari Waffle
Melvin Klenetsky
Robert Cole
Therese Seiler
Kirby Ashley

The Office of General Counsel is retaining Pinkerton's Incorporated for the purpose of serving the enclosed subpoenas on the above-named individuals. Alternatively, if any of these individuals have left the Chicago area, Pinkerton's should obtain forwarding addresses for these individuals. It is our understanding that your firm charges \$25.00 per hour and 20¢ a mile to undertake an assignment of this kind. This Office authorizes you to spend no more than two hours time for any one of the six individuals.

Please give periodic status reports to Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

2 sets of letters and subpoenas
for 6 individuals

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Therese M. Seiler
5637 N. Glenwood
Chicago, Illinois 60660

Re: MUR 1352(81)

Dear Ms. Seiler:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 2:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, which appears to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

330403708



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Therese M. Seiler
5637 N. Glenwood
Chicago, Illinois 60660

Re: MUR 1352(81)

Dear Ms. Seiler:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 2:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese Seiler
260 E. High St.
Manchester, N.H.

RE: MUR 1352(81)

Dear Ms. Seiler:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Therese Seiler
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert — Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Subpoena

137493708

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

SUBPOENA


TO: Therese Seiler
5637 N. Glenwood
Chicago, ILL. 60660

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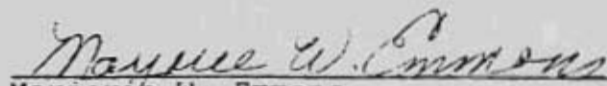
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 9:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Kirby Ashley
5637 North Glenwood
Chicago, Illinois 60660

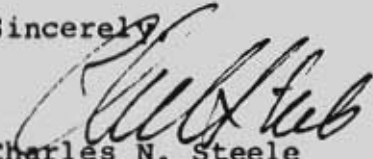
Re: MUR 1352(81)

Dear Mr. Ashley:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 1:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Kirby Ashley
5637 North Glenwood
Chicago, Illinois 60660

Re: MUR 1352(81)

Dear Mr. Ashley:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 1:00 p.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Ashley:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

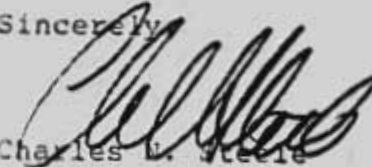
Letter to Kirby Ashley
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert — Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles E. Stetle
General Counsel

Enclosure

Subpoena

3304037019

SUBPOENA

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 11:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand on the 23rd day of March 1981.

John Warren McGarry
John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Robert Cole
4119 West Belle Plaine
Chicago, Illinois 60641

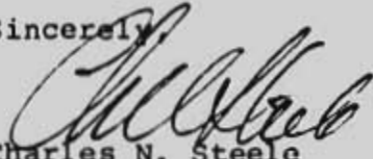
Re: MUR 1352(81)

Dear Mr. Cole:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 11:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Cole
4119 West Belle Plaine
Chicago, Illinois 60641

Re: MUR 1352(81)

Dear Mr. Cole:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 11:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Cole
4119 West Belle Plaine
Chicago, Ill. 60641

RE: MUR 1352(81)

Dear Mr. Cole:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

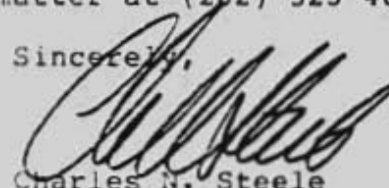
Letter to Robert Cole
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

137403709

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

SUBPOENA

TO: Robert Cole
4119 West Belle Plaine
Chicago, ILL. 60641


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You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 2:00 p.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Melvin Klenetsky
4823 North Lawndale
Chicago, Illinois 60618

Re: MUR 1352(81)

Dear Mr. Klenetsky:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 12:00 (noon). Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, likely belonging to Charles N. Steele, is written over the word "Sincerely,".

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Melvin Klenetsky
4823 North Lawndale
Chicago, Illinois 60618

Re: MUR 1352(81)

Dear Mr. Klenetsky:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 12:00 (noon). Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: MUR 1352(81)

Dear Mr. Klenetsky:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 4:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

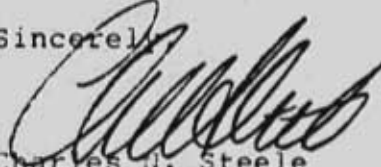
Letter to Melvin Klenetsky
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

33703700

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

SUBPOENA


TO: Melvin Klenetsky
4823 North Lawndale
Chicago, ILL. 60618

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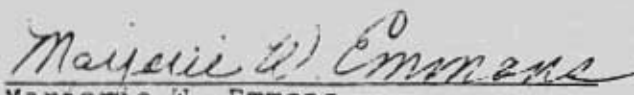
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604 at 4:00 p.m. on April 28, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 29, 1981

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Illinois 60660

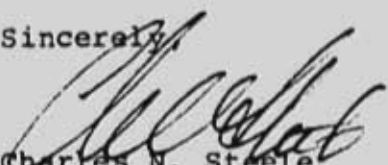
Re: MUR 1352(81)

Dear Mr. Eisenberg:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Illinois 60660

Re: MUR 1352(81)

Dear Mr. Eisenberg:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

RB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Eisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

0 3 7 4 9 3 7 0 0

Subpoena

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

SUBPOENA

TO: Elliot Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

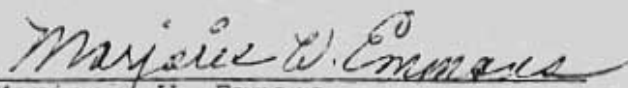
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 10:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1981

Shari D. Waffle
4728 North Albany Street
Chicago, Illinois 60625


Re: MUR 1352(81)

Dear Ms. Waffle:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

Since the original date for your deposition has passed, your deposition has been rescheduled for Thursday, June 11, 1981, at 10:00 a.m.. Please review the enclosed material for further information concerning your deposition. The Commission wishes to inform you that failure to appear for the rescheduled deposition may result in the assessment of costs against you. If you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Shari D. Waffle
4728 North Albany Street
Chicago, Illinois 60625

Re: MUR 1352(81)

Dear Ms. Waffle:

Enclosed please find a letter and subpoena requiring you to appear and give sworn testimony in connection with an investigation being conducted by the Federal Election Commission. This subpoena was originally sent by certified mail on March 27, 1981, scheduling your deposition for April.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Letter and Subpoena

KB
4/24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

RE: MUR 1352(81)

Dear Ms. Waffle:

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

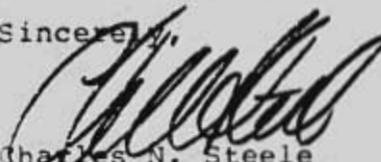
Letter to Shari D. Waffle
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

1304067031

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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand on the 23rd day of March 1981.

John Warren McGarry
John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

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

FEDERAL ELECTION COMMISSION

memo to file; bank acct
numbers, routing slips

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input checked="" type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

L. G. Leric

date

11-29-82

FEC 9-21-77

PINKERTON'S, INC.

This is
NOT
a bill

Address: 403 Main Street
Buffalo, NY 14203

Telephone: (716) 852-1760

Date: May 13, 1981

To: Federal Election Commission
Washington, DC 20463
ATTN: Charles N. Steele, General Counsel

CONFIRMATION OF ORDER FOR SERVICES

(Bills payable upon presentation)

RE: Serve Subpoenas

Per Investigator Assigned:

1. \$17.50 per hour including travel and report writing time.
2. Plus expenses: auto at \$.20/mile, tolls, telephones, fees and incidentals.
3. We will not exceed two (2) hours investigation per witness unless verbally authorized by you.

We appreciate your business. We do not guarantee success.

This Confirmation Order must be signed by an authorized representative of your firm and one copy returned to Pinkerton's, Inc. within ten (10) days.

Pinkerton's, Inc. will use its best efforts in the performance of the requested services. Fees are based on time and expenses as specified above. Pinkerton's, Inc. does not make any representations or guarantees concerning the results of the investigative services.

It is suggested that no action be taken based on investigative reports furnished you without first consulting an official of Pinkerton's, Inc.

COMPANY FEDERAL ELECTION COMMISSION

BY [Signature]

TITLE GENERAL COUNSEL

DATE 5-19-81

PINKERTON'S, INC.

[Signature]
District Manager/Manager

PINKERTON'S, INC.

This is
NOT
a bill

Address: 403 Main Street
Buffalo, NY 14203

Telephone: (716) 852-1760

Date: May 13, 1981

To: Federal Election Commission
Washington, DC 20463
ATTN: Charles N. Steele, General Counsel

CONFIRMATION OF ORDER FOR SERVICES

(Bills payable upon presentation)

RE: Serve Subpoenas

MAY 18 P 4:13

Per Investigator Assigned:

1. \$17.50 per hour including travel and report writing time.
2. Plus expenses: auto at \$.20/mile, tolls, telephones, fees and incidentals.
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It is suggested that no action be taken based on investigative reports furnished you without first consulting an official of Pinkerton's, Inc..

COMPANY _____

BY _____

TITLE _____

DATE _____

PINKERTON'S, INC.

District Manager/Manager

PINKERTON'S, INC.

This is
NOT
a bill

Address: 403 Main Street
Buffalo, NY 14203

Telephone: (716) 852-1760

Date: May 13, 1981

To: Federal Election Commission
Washington, DC 20463
ATTN: Charles N. Steele, General Counsel

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(Bills payable upon presentation)

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COMPANY _____

BY _____

TITLE _____

DATE _____

PINKERTON'S, INC.

District Manager/Manager

8 3 0 4 0 3 7 0 1

RESTRICTED & CONFIDENTIAL

Federal Election Commission
Washington, DC 20463
ATTN: Charles N. Steele
General Counsel



81 MAY 18 PM 12:34



Pinkerton's, Inc.
1010 Lake Street
Oak Park, IL 60301
Chi: (312) 626-3400
Oak Park: (312) 383-4000

May 8, 1981

EARL O. BERG
District Manager

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Sir:

This will confirm an understanding reached on May 6, 1981, between you and Mr. E.J. Konecki, representing Pinkerton's, Inc., wherein Pinkerton's, Inc., was ordered to supply to you the following service:

SERVE SUBPOENAS

The rate for this service shall be \$200.00 per eight hour day for each investigator detailed, plus expenses, and that work in excess of eight hours shall be charged at a rate of \$25.00 per hour.

All bills are payable upon presentation.

We appreciate the opportunity to serve you.

* Pinkerton's Inc. ~~may not~~ is authorized to expend no more than 2 hours per subpoenaed individual without prior approval of the Federal Election Commission.

PINKERTON'S, INC.

E.O. KOSBERG
District Manager

PLD/j

Please acknowledge and return the duplicate copy in the enclosed envelope.

Accepted By: [Signature] Title: Quiddon Date: 5/14/81

* per letter of 4/29/81

MAY 14 P 1:00



1352

Pinkerton's, Inc.
1010 Lake Street
Oak Park, IL 60301
Chi: (312) 626-3400
Oak Park: (312) 383-4000

May 8, 1981

EARL O. KOSBERG
District Manager

Mr. Charles N. Steele
% Federal Election Commission
Washington, D.C. 20463

11 MAY 14 P 1:00

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PINKERTON'S, INC.

* Pinkerton's Inc. ~~may not~~ is authorized to expend no more than 2 hours per subpoenaed individual without prior approval of the Federal Election Commission.

E.O. Kosberg
E.O. KOSBERG
District Manager

PLD/j

Please acknowledge and return the duplicate copy in the enclosed envelope.

Accepted By: *[Signature]* Title: *President* Date: *5/14/81*

* per letter of 4/29/81



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1981

Earl Konecki
Pinkerton's Incorporated
1000 Lake Street
Oak Park, Illinois 60301

Re: MUR 1352(81)

Dear Mr. Konecki:


Pursuant to your conversation with Robert Bogin on April 23, 1981, please find enclosed subpoenas and letters to be served upon the following six individuals:

Elliot Eisenberg
Shari Waffle
Melvin Klenetsky
Robert Cole
Therese Seiler
Kirby Ashley

The Office of General Counsel is retaining Pinkerton's Incorporated for the purpose of serving the enclosed subpoenas on the above-named individuals. Alternatively, if any of these individuals have left the Chicago area, Pinkerton's should obtain forwarding addresses for these individuals. It is our understanding that your firm charges \$25.00 per hour and 20¢ a mile to undertake an assignment of this kind. This Office authorizes you to spend no more than two hours time for any one of the six individuals.

Please give periodic status reports to Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosures
2 sets of letters and subpoenas
for 6 individuals



11012-1352

RECEIVED
GCC#4668
81 MAY 14 AM: 37

Pinkerton's, Inc.
1010 Lake Street
Oak Park, IL 60301
Chi: (312) 626-3400
Oak Park: (312) 383-4000

May 8, 1981

EARL O. KOSBERG
District Manager

1 MAY 14 P 1:00

Mr. Charles N. Steele
% Federal Election Commission
Washington, D.C. 20463

Sir:

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All bills are payable upon presentation.

We appreciate the opportunity to serve you.

PINKERTON'S, INC.


E.O. KOSBERG
District Manager

PLD/j

Please acknowledge and return the duplicate copy in the enclosed envelope.

Accepted By: _____ Title: _____ Date: _____

P.O. Box 24
River Forest, 60301
IL



Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Personal

8 3 28 18 MAY 18

100408

RECEIVED

SCC# 4622

81 MAY 5 PM 12:12

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

ROBERT R. GRIFFIN
 CLEVELAND THURBER
 JAMES F. SCHOENER
 COUNSEL

SUITE 1240

15 FIFTEENTH STREET, N.W.
 WASHINGTON, D.C. 20005

SIDNEY T. MILLER (1884-1940)
 GEORGE L. CANFIELD (1886-1928)
 LEWIS H. PADDOCK (1866-1938)
 FERRIS D. STONE (1882-1945)

MAY 5 P 2:21

TELEPHONE (202) 622-9333

EMMETT E. EAGAN
 WILLIAM G. BUTLER
 JOHN A. GILRAY, JR. RC.
 JAMES E. TOBIN
 STRATTON S. BROWN
 RICHARD S. GUSHÉE, RC.
 PETER R. THURBER
 LAWRENCE A. KING, RC.
 ROBERT E. HAMMILL
 JOSEPH F. WAYCOCK, JR.
 ALLEN SCHWARTZ
 JOHN W. GELDER, RC.
 GEORGE E. PARKER III
 RICHARD A. JONES, RC.
 STEVAN UZELAC, RC.
 GILBERT E. GOVE
 WOLFGANG HOPPE
 ROBERT S. KETCHUM
 SAMUEL J. MCKIM III, RC.
 ROCQUE E. LIPFORD, RC.
 JOEL L. PIELL
 ROBERT E. GILBERT
 BRUCE D. BIRGBAUER
 DAVID OLNSTEAD
 GEORGET T. STEVENSON
 JOHN A. THURBER

ORIN D. BRUSTAD
 CARL H. VONZENDE
 GORDON A. BECKER
 DAVID G. JOSEWICA
 CHARLES L. BURLEIGH, JR.
 JOHN A. HARRER
 GREGORY L. CURTNER
 DENNIS R. NEIMAN
 KENNETH E. SONOP
 LEONARD D. GIVENS
 W. MACK FAISON
 MICHAEL D. MULCAHY
 JAMES W. WILLIAMS
 THOMAS G. SCHROETER
 THOMAS R. HUSTOLES
 JOHN D. FIRICH
 WILLIAM J. DANHOFF
 CLARENCE L. POZZA, JR.
 JERRY T. RUPLEY
 JAMES W. GOSS
 JOSEPH A. SOBROWSKI
 THOMAS C. PHILLIPS
 MICHAEL W. HARTMANN
 KENT E. SHAFER
 DENNIS A. LOY
 FRANK L. ANDREWS

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

MONROE OFFICE
 EXECUTIVE CENTRE
 214 EAST ELM AVENUE
 MONROE, MICHIGAN 48031
 (313) 243-2000

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

TRAVERSE CITY OFFICE
 13999 WEST BAY SHORE DRIVE
 TRAVERSE CITY, MICHIGAN 49684
 (616) 946-1000

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

THOMAS W. LINN
 RICHARD J. MARER
 STEPHEN G. PALMS
 WILLIAM STEINHAEVER
 JEROME R. WATSON
 JOHN J. COLLINS, JR.
 DIANNA J. DONATI
 DONALD W. KEIM
 LARRY J. SAYLOR
 CHARLES E. SCHOLL
 RICHARD J. BERTAN
 MICHAEL R. STRAINS
 MAUREEN R. AUGHTON
 LELAND D. BARRINGER
 EDW. D. SINDSWAI
 TIMOTHY D. SOCHOCKI
 KRISTINE G. OPPERWALL
 HUGH M. SMITH
 HARJORY G. BASILE
 BEVERLY HALL BURNS
 TERENCE M. CRAWFORD
 MICHAEL E. DOWDLE
 STEVEN M. GLOYSAY
 STEPHEN R. GOOSTREY
 SALLY S. HARWOOD

RYAN H. HAYWOOD
 ALINE H. LOTTER
 GEORGE G. MARTIN
 CHARLES M. WOCUEN
 GERALD E. ROSEN
 J. KEVIN TRIMMER
 STEVEN D. WETHING
 BRANT A. FREER
 JOHN D. STOUT
 AMANDA VAN GUSEN
 BRIAN A. KASER
 GARY A. BRUDER
 RONALD J. CLAPHAM
 DAVID F. DIXON
 SALLY L. GEIR
 DOUGLAS G. DEOGA
 KAT J. JOHNSON
 JENNA RUTH JOHNSTON
 JOHN W. KRAUS
 E. ELIZABETH PERLMAN
 FREDERICA J. STICHNOTH
 J. SCOTT TIMMER
 JOAN BECKHAM WHITMORE
 CONRAD L. HALLETT, JR.
 JOHN D. RAVIS

May 4, 1981

General Counsel
 Federal Election Commission
 1325 K Street, N. W.
 Washington, D.C. 20463

Attention: Robert Bogin, Esq.

Re: M.U.R. 1352

Dear Mr. Bogin:

In answer to the allegations made in the above-entitled matter, the respondent, Citizens for LaRouche, denies knowingly or willfully furnishing any false, fictitious or fraudulent evidence, books or information or in any manner knowingly and willfully submitting material that was false. Specifically, respondent says that money orders in the names of Janice and Robert Hart, Paul Greenberg and William Lerch were accepted and reported to the Commission, believing these to be contributions from the persons named.

Respondent finds no evidence or information in M.U.R. 1352 which would justify the conclusion that Citizens for LaRouche knew (or should have known) that the funds for the money orders were supplied by others.

Very truly yours,

James F. Schoener
 James F. Schoener

JFS:mfb

cc: Ms. Barbara Boyd

JFS

LAW OFFICES OF

MILLER, CANFIELD, PADDOCK AND STONE

SUITE 1240

1015 FIFTEENTH STREET, N.W.

WASHINGTON, D.C. 20005



General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20463

2

7

1

3

8

DATE: March 18, 1981
TO: Federal Election Commission
FROM: Citizens for LaRouche
RE: Appearance of Counsel

Please take notice that Citizens for LaRouche does hereby designate James F. Schoener of the firm of Miller, Canfield, Paddock and Stone as its attorney and counsel for any and all matters, communications, notices, subpoenas and service of process that your Commission may have concerning our Committee.

The present address for Mr. Schoener is Suite 1240, 1015-15th Street, N.W., Washington, D.C. 20005, and his telephone numbers are 789-8690 and 822-9333.

This notice of representation and appearance shall continue until revoked in writing.

Citizens for LaRouche

By Patricia Dolbeare
Patricia Dolbeare,
Treasurer

11 MAR 27 10:48

RECEIVED

FBI

DATE: March 18, 1981
TO: Federal Election Commission
FROM: Citizens for LaRouche
RE: Appearance of Counsel

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This notice of representation and appearance shall continue until revoked in writing.

Citizens for LaRouche

By Patricia Dolbeare
Patricia Dolbeare,
Treasurer

84:01A 12 MAR 27 1981

GENERAL INVESTIGATIVE DIVISION

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use \$300

575476

7 0/100
8/2

APR 27 1981

5/5

3

RETURNED
TO
SENDER
UNCLAIMED
New York, N.Y. 10033

Denise Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

POSTAGE AND FEES PAID



CERTIFIED

994671

3 3 Put in my name
to Bill 37791 lb 29

✓

Muk 1362 - Boger

PS Form 3811, Jan. 1978

1. **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.....0

☐ Show to whom, date and address of delivery.....0

☐ RESTRICTED DELIVERY
Show to whom and date delivered.....0

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....0

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**

Eleise Hoon

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>949671</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. **DATE OF DELIVERY**

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS

4-8-81

STOP : 1982-700-400

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

575477

10

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10

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10

RETURNED
TO
SENDER
UNCLAIMED
New York, N.Y. 10023

Roger Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

POSTAGE AND FEES PAID



CERTIFIED

949673

0 1 0 4 0 3 7 2 8 2 7



Mike 1352 - Roger

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): <input type="checkbox"/> Show to whom and date delivered..... <input type="checkbox"/> Show to whom, date and address of delivery..... <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered..... <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery..... (CONSULT POSTMASTER FOR FEES)								
2. ARTICLE ADDRESSED TO: <i>Roger Ham</i>								
3. ARTICLE DESCRIPTION: <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td><i>949672</i></td> <td></td> </tr> </table> (Always obtain signature of addressee or agent)			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		<i>949672</i>	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	<i>949672</i>							
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent								
4. DATE OF DELIVERY		POSTMARK						
5. ADDRESS (Complete only if requested)								
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS						

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

4-8-81

U.S. POSTAGE : 10c PER COPY

*2c
 2-9-81
 Memo
 to Bill
 Re: 1352*

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use

740208

MAR 30 1991

4-5
4/13

Revised from
FD Form 3800-5
May 1979



Gerald Pechenuk
~~6344 Southwood, 2nd~~
~~Clayton, Mo. 63105~~
3817 No. Lawndale
Chicago, Ill. 60618

UNCLAIMED



FINAL NOTICE

CERTIFIED

949553

304070
MURK 1352-Boyer

PS Form 3811, Jan. 1976

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:
Gerald Rechenuk

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
55556

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

★EPO: 1976-300-488

3-27-81

away from
to find
18-28-7 7.22

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use \$300

038936

DATE

BY MAIL

BY AIR

RETURN

Obtained from
FD Form 38-62-A
May 1978

SEE UNKNOWN

Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

POSTAGE AND FEES PAID



CERTIFIED

999563

4-2-81

Return to sender

See 8-2-81

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, SECURED AND CERTIFIED MAIL

1352-Box

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..... 6

☐ Show to whom, date and address of delivery..... 6

☐ RESTRICTED DELIVERY
Show to whom and date delivered..... 6

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery..... 6

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Jennifer Rae

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	595646	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER REASON:

UNKNOWN

CLERK'S INITIALS

*UPO 1 1978-000-410

3-28-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



MOVED LEFT NO ADDRESS

Mathew C. Guice
298 Normal Avenue
Buffalo, N.Y. 14213

MARK-UP

197

CERTIFIED

949571

8

7

3-27-81
 Adding items to
 from ~~original~~ *original* *of*

Form 3811, Nov. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1352-Boyer

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..... 0
☐ Show to whom, date and address of delivery..... 0
☐ RESTRICTED DELIVERY
 Show to whom and date delivered..... 0
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery \$____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mathew C. Guie

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

125646

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S
INITIALS

3-27-81

★GPO : 1975-500-400

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

CERTIFIED

949570

3
87

MUR 1392-Box

1. **SENDER:** Complete items 1, 2, and 3.
Add your address to the "RETURN TO" space on reverse.

2. 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)

3. **ARTICLE ADDRESSED TO:**

Linda Frisch

4. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>KL5946</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ ADDRESS ☐ AUTHORIZED AGENT

5. **DATE OF DELIVERY**

6. **POSTMARK**

7. **ADDRESS (Complete only if requested)**

8. **UNABLE TO DELIVER BECAUSE:**

9. **CLERK'S INITIALS**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

☆GPO : 1975-000-210

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



REASON CHECKED
Unclaimed _____
Addressee unknown _____
Insufficient Address _____
No such street _____ number _____
No such office in state _____
Do not re-mail in this envelope _____

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

POSTAGE AND FEES PAID



unk 2584

CERTIFIED

949554

4-8-81
 1352- *Begin*

3-27-81

1. **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.....c

☐ Show to whom, date and address of delivery.....c

☐ RESTRICTED DELIVERY
 Show to whom and date delivered.....c

☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.....c

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**

Melvin Klenitzky

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	955646	

(Always obtain signature of addressee or agent)

I have examined the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. **DATE OF DELIVERY**

95

5. **ADDRESS** (Complete only if registered)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



Mr. David Hoffman
1101 West Grace Street
Chicago, IL 60613

HUF 01X 3/309911 03/30/81

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

CERTIFIED

949568

3 87

8 3 0 4 0 3 7 4 1

✓

MURK 1352 - Boyer

1. The following service is requested (check one):

☐ Show to whom and date delivered.....6

☐ Show to whom, date and address of delivery.....6

☐ RESTRICTED DELIVERY

 Show to whom and date delivered.....6

☐ RESTRICTED DELIVERY.

 Show to whom, date, and address of delivery 3.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

David Hoffman

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>825056</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ ADDRESS ☐ AUTHORIZED AGENT

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CHICAGO
MAY 24 1961
AM

FORM 3811, JAN. 1959

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

EPA: 1070-200-400

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



Khushro Ghandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

CERTIFIED

949573

MURK 1352-Poster

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:

Khusko Shanthi

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>EL5040</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

signature ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER REASON:

CLERK'S INITIALS

PS Form 3811, Jan 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

★ GPO : 1975-0-254-450

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



REASON CHECKED
Unclaimed _____
Addressee unknown _____
Insufficient Address _____
No such street _____
No such office in state _____
Do not stamp in this envelope

Kirby Ashley
~~5631 North Glenwood~~
Chicago, Ill. ~~60660~~

POSTAGE AND FEES PAID



*Unknown
6098
ch*

CERTIFIED

949566

MUK 1352 - Bogie

PS Form 3811, Jan. 1976

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:

Kirby Ashley

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	195646	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE _____ ADDRESS _____ DATED _____

4. DATE OF DELIVERY	POSTMARK
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

3-27-81

GPO : 1975-0-495

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



~~MOVED~~ LEFT NO ADDRESS

Roger Ham
142 Livingston Avenue
Buffalo, N.Y. 14213

15111
CERTIFIED

048583

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

✓

7MUK 1352 - Bogie

● **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:**

Roger Ham

2. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>EP544B</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Address ☐ Authorized agent

4. **DATE OF DELIVERY**

POSTMARK

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS

☆GPO : 1975-500-455

3-27-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Official Business

Penalty for Private Use \$300



Moved *new*
address

Denise Ham
143 Livingston Avenue
Buffalo, N.Y. 14213

CERTIFIED

999584

873 011 71

3 3 1

4-2-81

Phy. 700 report 9
From Project 2

✓

MUM 1355- Boston

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.....c

☐ Show to whom, date and address of delivery.....c

☐ RESTRICTED DELIVERY
Show to whom and date delivered.....c

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Denise Ham

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>125646</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

EFG: 500-000-000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

CLAIM CHECK
NO. **038959**

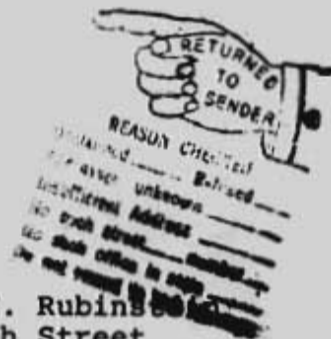
DATE **3/30/79**
☐ HOLD

1ST NOTICE

2ND NOTICE

RETURN

Obtain from
FD Form 364-A
May 1979



Joyce H. Rubins
163 14th Street
Buffalo, N.Y. 14213

POSTAGE AND FEES PAID



CERTIFIED

949570

Rec'd 4-20-81
 8 1 1 1 1 1 1 1 1 1

Mun135 - Bogin

PS Form 3811, Jan. 1978

1. **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..... 0

☐ Show to whom, date and address of delivery..... 0

☐ RESTRICTED DELIVERY
 Show to whom and date delivered..... 0

☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery..... 0

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESS TO

Joyce H. P. Bogin

3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO.

01556

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Address ☐ Authorized agent

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

3-27-81

U.S. POSTAL SERVICE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Return

Robert Cole
4119 West Belle Plaine
Chicago, Ill. 60641

CERTIFIED

949564

3 1 0 5 7 1 7 3

MUR 1352 - Boger

U.S. MAIL, JAN. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. **SENDER:** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

☐ Show to whom and date delivered.....¢

☐ Show to whom, date and address of delivery.....¢

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.....¢

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery. \$.....

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**

Robert Cole

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>425540</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. **DATE OF DELIVERY**

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS

☆ GPO : 1975-362-490

3-27-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



POSTAGE AND FEES PAID



UNCLAIMED
RETURNED TO SENDER
Ronald R. [illegible]
5639 A. S. [illegible] way
St. Louis, [illegible]

CERTIFIED

949555

87
5
3
4
0
3
7

✓
MUR 1352-Begin

SENDER: Completes 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.....c
☐ Show to whom, date and address of delivery.....c
☐ RESTRICTED DELIVERY
Show to whom and date delivered.....c
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Ronald R. Betting

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

555346

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S
INITIALS

☆GPO : 1979-000-490

3-27-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



REASON CHECKED
Undelivered
Unknown
Invalid
Do not mail

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

Original from
FE Form 3446-A
Oct. 1980

RETURN

NO NOTICE

DATE

☐ HOLD

CLAIM CHECK
NO.
702387

949567

MUR 1352- Bogus

PS Form 3811, Jan. 1978

1. 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.) <input type="checkbox"/> Show to whom and date delivered..... <input type="checkbox"/> Show to whom, date and address of delivery..... <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered..... <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery..... (CONSULT POSTMASTER FOR FEES)								
2. ARTICLE ADDRESSED TO: <i>Shari D. Waffle</i>								
3. ARTICLE DESCRIPTION: <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td><i>L95316</i></td> <td></td> </tr> </table> (Always obtain signature of addressee or agent)			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		<i>L95316</i>	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	<i>L95316</i>							
I have inspected the article described above. <input checked="" type="checkbox"/> ENCLATURE <input type="checkbox"/> Address <input type="checkbox"/> Authorized agent								
4. DATE OF DELIVERY		POSTMARK						
5. ADDRESS (Complete only if requested)								
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS						

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



POSTAGE AND FEES PAID



ATTN: C-408
Pdt

REASON CHECKED

Incorrect address	Refused
Not a letter address	
Not a letter address	
Left no address	
No such office in state	
Postage due	

CM

Therese Seiler
260 E. High St.
Manchester, N.H.

SEI 60 050315N1 04/03/81

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

408

949569

Handwritten: *Handwritten note: "Handwritten note: 'Awaiting mail to be returned'"*

59

Mark 1352 - Fog

1. 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.....c

☐ Show to whom, date and address of delivery.....c

☐ RESTRICTED DELIVERY
Show to whom and date delivered.....c

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Theresa Secker

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>625346</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3-27-81

2070 : 1070-050-050



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Mr. Ham:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

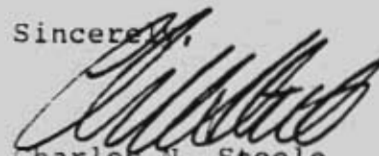
Letter to Roger Ham
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogen on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogen the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

1 3 3 4 0 3 7 0 1 6 1

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ROYCE LAM
2 South Pinehurst Avenue
Apartment 2B
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Mr. Lam:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Roger Ham
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles H. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

RB
3/25

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


SUBPOENA

TO: Roger Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

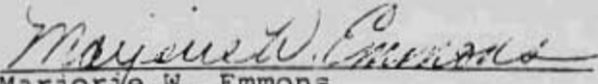
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room G-18, 40 Foley Square, New York, N.Y. at 1:00 p.m. on April 17, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Denise Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Ms. Ham:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

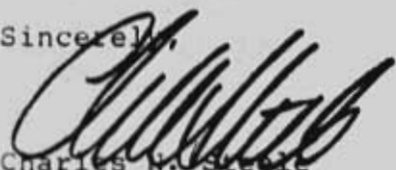
Letter to Denise Ham
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles W. Steele
General Counsel

Enclosure

Subpoena

111-1352-7000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lorise Lam
2 South Pinehurst Avenue
Apartment 2B
Washington Heights, N.Y.

RE: MUR 1352(81)

Dear Ms. Lam:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 17, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Denise Ham
Page Two
NOK 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles M. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

RB
3/25

3774067

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

SUBPOENA

TO: Denise Ham
2 South Pinehurst Avenue
Apartment 2D
Washington Heights, N.Y.

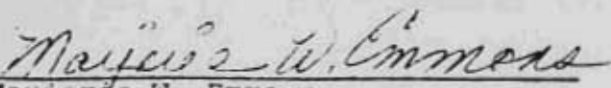
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room G-18, 40 Foley Square, New York, N.Y. 10007, at 2:00 p.m. on April 17, 1981, and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joyce H. Rubinstein
163 14th Street
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Ms. Rubinstein:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

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Subpoena

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JOYCE L. RUBINSTEIN
163 14th Street
Brooklyn, N.Y. 11213

RE: NUR 1352(81)

Dear Ms. RUBINSTEIN:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Joyce H. Rubinstein
Page Two
HUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles H. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

RB

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

SUBPOENA

TO: Joyce Rubinstein
163 14th Street
Buffalo, N.Y. 14213


You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at 10:00 a.m. on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mathew C. Guice
298 Normal Avenue
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Mr. Guice

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

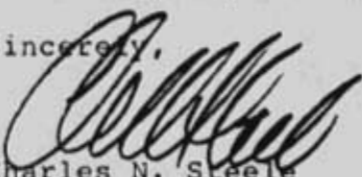
Letter to Mathew C. Guice
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

03740670475

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matthew C. Guice
291 Normal Avenue
Buffalo, N.Y. 14213

RE: MOR 1352(81)

Dear Mr. Guice:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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.

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Letter to Mathew C. Guice
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

RB

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

SUBPOENA

TO: Matthew Guice
298 Normal Avenue
Buffalo, N.Y. 14213

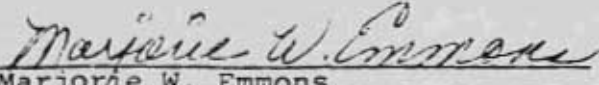
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at 9:00 a.m. on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Ms. Fisch:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

37773

Subpoena

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linda Fisch
421 Herwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Ms. Fisch:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

037479

KB

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

SUBPOENA

TO: Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

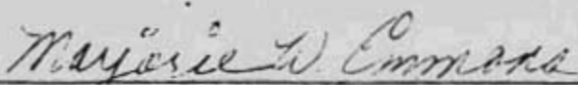
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at 1:00 p.m. on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Khushro Gandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Mr. Gandhi:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at noon has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Khushro Ghandhi
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amishro Chaudhri
421 Norwood Avenue
Buffalo, N.Y. 14222

RE: MUR 1352(81)

Dear Mr. Chaudhri:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at noon has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Khushro Chandhi
Page Two
NOR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Clea red by KAG

KB

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

SUBPOENA

TO: Khushro Gandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

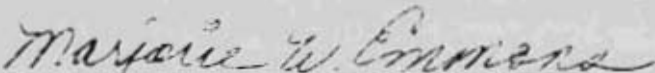
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at noon on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

RE: MUR 1352(81)

Dear Ms. Roe:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

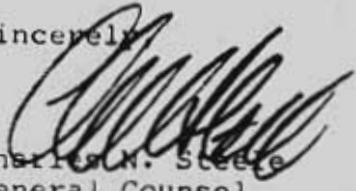
Letter to Jennifer Roe
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

1370370192

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jennifer Roe
26 Kipley Place
Buffalo, N.Y. 14213

RE: MUR 1352(61)

Dear Ms. Roe:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 1, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Jennifer Roe
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles R. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

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


SUBPOENA

TO: Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

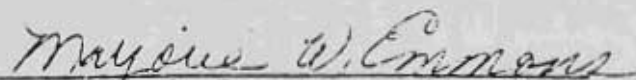
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 914, Federal Building, 111 W. Huron Street, Buffalo, N.Y. 14202, at 11:00 a.m. on May 1, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

RE: MUR 1352(81)

Dear Ms. Waffle:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

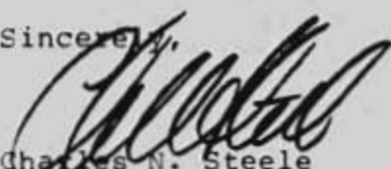
Letter to Shari D. Waffle
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

771017100

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shari E. Waifle
4728 North Albany Street
Chicago, Ill. 60625

RE: MUR 1352(81)

Dear Mr. Waifle:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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Letter to Shari D. Waffle
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Rogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Rogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

RB

33771393

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

SUBPOENA

TO: Shari D. Waffle
4728 North Albany Street
Chicago, ILL. 60625

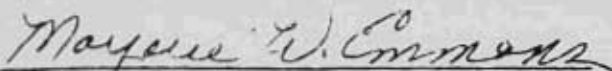
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 9:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Hoffman
1016 Arthill Place
St. Louis, Mo. 63139

RE: MUR 1352(81)

Dear Mr. Hoffman:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

i c l z s e f u

Subpoena

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Lofgren
1016 Arthill Place
St. Louis, Mo. 63139

RE: SUR 1352(61)

Dear Mr. Lofgren:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 1:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to David Hoffman
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

JB

1010370101

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

SUBPOENA

TO: David Hoffman
1016 Arthill Place
St. Louis, Mo. 63139

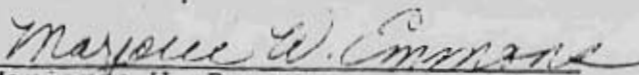
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a) (3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 1:00 p.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a) (2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese Seiler
260 E. High St.
Manchester, N.H.

RE: MUR 1352(81)

Dear Ms. Seiler:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

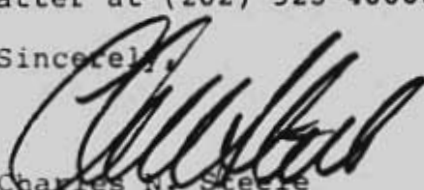
Letter to Therese Seiler
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert bogin the attorney handling this matter at (202) 523-4000.

Sincerely,


Charles W. Steele
General Counsel

Enclosure

Subpoena

13740370107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Therese Seiler
200 E. High St.
Manchester, N.H.

RE: MUR 1352(81)

Dear Ms. Seiler:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 9:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

03719700

33

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


SUBPOENA

TO: Therese Seiler
5637 N. Glenwood
Chicago, ILL. 60660

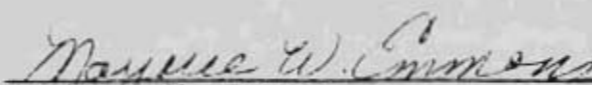
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 9:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

RE: MUR 1352(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

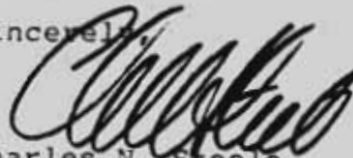
Letter to Gerald Pechenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

13749370112

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Pechenuk
6344 Southwood, 2K
Clayton, N.C. 63105

RE: MUR 1352(81)

Dear Mr. Pechenuk:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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.

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Letter to Gerald Pechenuk
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

R3

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

03040370111

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


SUBPOENA

TO: Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

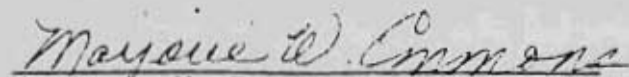
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, Ill. 60604, at 10:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Rose
4127 West Belle Plaine
Chicago, Ill. 60641

RE: MUR 1352(81)

Dear Mr. Rose:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 3:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Gerald Rose
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure

Subpoena

MUR 1352 - Bogin

Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space.

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:
Gerald Rose

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
155646
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Gerald Rose

4. DATE OF DELIVERY
5-30-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

CHICAGO, IL IRVING PARK STA
POST OFFICE
1881
USPO

327-81

☆ GPO : 1979-300-489

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald Rose
4127 West Leno Plaine
Chicago, Ill. 60641

RE: MUR 1352(81)

Dear Mr. Rose:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 3:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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Letter to Gerald Rose
Page Two
HUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Login on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Login the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

23

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

SUBPOENA

TO: Gerald Rose
4127 West Belle Plaine
Chicago, Ill. 60641

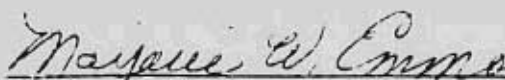
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 3:00 p.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: MUR 1352(81)

Dear Mr. Klenetsky:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 4:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

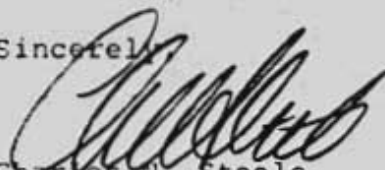
Letter to Melvin Klenetsky
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

2025 10 13 14:37:22

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Helvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

RE: MUR 1352(81)

Dear Mr. Klenetsky:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 4:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Melvin Klenetsky
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

RB

112007004000

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


SUBPOENA

TO: Melvin Klenetsky
4823 North Lawndale
Chicago, ILL. 60618

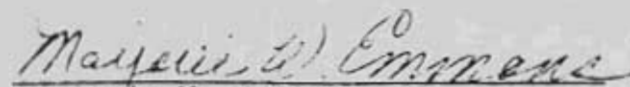
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Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

ORIGINAL MAIL
RETURN RECEIPT REQUESTED

Robert Cole
4115 West Lottic Plaine
Chicago, Ill. 60641

RE: MUR 1352(81)

Dear Mr. Cole:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

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1917-18



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Cole
4119 West Belle Plaine
Chicago, Ill. 60641

RE: MUR 1352(81)

Dear Mr. Cole:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 2:00 p.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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0 1 2 3 4 5 6 7 8 9

Subpoena

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

SUBPOENA


TO: Robert Cole
4119 West Belle Plaine
Chicago, ILL. 60641

100-107030-30

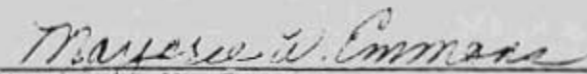
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Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Eisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.


Letter to Elliot R. Eisenberg
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4030.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

001037033

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliot P. Lisenberg
5611 North Glenwood
Chicago, Ill. 60660

RE: MUI 1352(81)

Dear Mr. Lisenberg:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 28, 1981 at 10:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Elliot R. Eisenberg
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Egin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Egin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles M. Steele
General Counsel

Enclosure

Subpoena

RB

0000037031

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


SUBPOENA

TO: Elliot Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

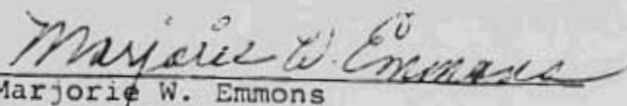
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 10:00 a.m. on April 28, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

RE: MUR 1352(81)

Dear Mr. Ashley:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

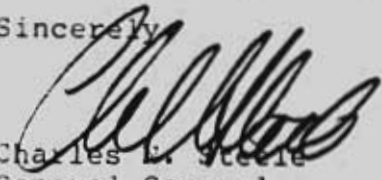
Letter to Kirby Ashley
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles L. Steele
General Counsel

Enclosure

Subpoena

304067037

ORIGINAL MAIL
RETURN RECEIPT REQUESTED

Wiley Ashley
5617 North Glenwood
Chicago, Ill. 60660

RE: BUR 1352(61)

Dear Mr. Ashley:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 25, 1981 at 11:00 a.m. has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

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


SUBPOENA

TO: Kirby Ashley
5637 North Glenwood
Chicago, ILL. 60660

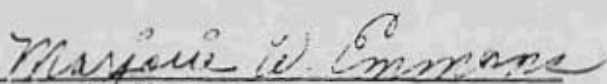
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 11:00 a.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ronald R. Lettag
5639 A.S. Kings Highway
St. Louis, Mo. 63109

RE: MUR 1352(81)

Dear Mr. Lettag:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 12:00 noon has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

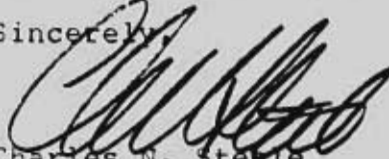
Letter to Ronald R. Bettag
Page Two
MUR 1352

Pursuant to 11 C.F.R. §111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Subpoena

23740570149

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ronald A. Lettag
3635 N.W. Kings Highway
St. Louis, Mo. 63109

RE: MOR 1352(61)

Dear Mr. Lettag:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 12:00 noon has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

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You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Letter to Ronald R. Bettag
Page Two
MUR 1352

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. A money order made payable to you in the amount of \$35.00 will be handed to you at the deposition.

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Robert Bogin the attorney handling this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

Prepared by Robert I. Bogin:ano 3/25/81
Cleared by KAG

3040370191

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


SUBPOENA

TO: Ronald R. Bettag
5639 A.S. Kings Highway
St. Louis, MO. 63109

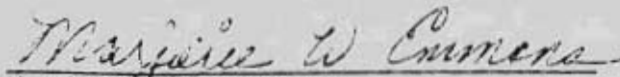
You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at Room 1500, Dirksen Fed. Bldg. 219 S. Dearborn St., Chicago, ILL. 60604, at 12:00 p.m. on April 29, 1981 and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the 23rd day of March 1981.


John Warren McGarry
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/JODY CUSTER *JK*
DATE: MARCH 24, 1981
SUBJECT: SUBPOENAS REGARDING MUR 1352

7
The attached subpoenas regarding MUR 1352, Commission
approved March 16, 1981, by a vote of 5-0, have been
signed and sealed this date.

ATTACHMENTS:
Subpoenas (17)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lyndon H. LaRouche, Jr.
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Mr. LaRouche:


This is to advise you that on March 16, 1981, the Federal Election Commission found reason to believe that your committee, the Citizens for LaRouche, has violated 2 U.S.C. § 441f, a provision of the FECA of 1971, as amended, and 26 U.S.C. § 9042(c) of Chapter 96 of Title 26, U.S. Code, by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee and for the submission of contributions for matching funds, we believe that you, as the candidate, should be made aware of this development. A copy of our letter to your Committee Treasurer is enclosed.

Under 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) this matter will remain confidential unless the Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at 202-523-4000. We have numbered this matter MUR 1352.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Letter to Committee Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lyndon H. LaRouche, Jr.
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Mr. LaRouche:

This is to advise you that on _____, 1981, the Federal Election Commission found reason to believe that your committee, the Citizens for LaRouche, has violated 2 U.S.C. § 441f, a provision of the FECA of 1971, as amended, and 26 U.S.C. § 9042(c) of Chapter 96 of Title 26, U.S. Code, by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee and for the submission of contributions for matching funds, we believe that you, as the candidate, should be made aware of this development. A copy of our letter to your Committee Treasurer is enclosed.

Under 2 U.S.C. § 437g(a) (4) (B) and § 437g(a) (12) (A) this matter will remain confidential unless the Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at 202-523-4000. We have numbered this matter MUR 1352.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Letter to Committee Treasurer

Prepared by RIBogin:ano 1/23/81 RB 1/23
Cleared by:

FEDERAL ELECTION COMMISSION

General Counsel's Factual and Legal Analysis Finding

DATE March 18, 1981

MUR NO. 1352(80)
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for LaRouche (CFL)

R. Bogin 523-4000

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

Summary of Allegations

This matter was generated from a referral by the Audit Division of matters noted during its review of the threshold submission for Presidential primary matching funds made by Citizens for LaRouche.

Factual Basis and Legal Analysis

A review of the threshold submission was undertaken in the normal course of carrying out the Commission's supervisory responsibilities under the Presidential Primary Matching Fund Account Act, 26 U.S.C. § 9031 et seq. As a result of this review, various money orders contributed to CFL and submitted to the Commission for matching funds were scrutinized. In an attempt to verify whether certain individuals contributed to CFL, the Commission discovered that certain money orders submitted for matching were not purchased or signed by the individual named on the money order. Specifically money orders in the names of Janice and Robert Hart, Paul Greenberg and William Lerch were not purchased by these individuals and the purported signature appearing on the money order was not that of the individual represented as contributing to CFL.

26 U.S.C. § 9042(c) states:

It is unlawful for any person knowingly and willfully to furnish any false, fictitious, or fraudulent evidence, books or information to the Commission under this Chapter, or to include in any evidence, books or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this Chapter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Ms. Gelman:

On March 16, 1981, the Federal Election Commission determined that there is reason to believe that your committee violated section 441f of the Federal Election Campaign Act of 1971, as amended ("the Act") and section 9042(c) of Chapter 96 of Title 26, U.S. Code by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.


Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Robert Bogin, the attorney assigned to this matter, at 202/523-4000.

Sincerely,


JOHN WARREN MCGARRY
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

cc: Lyndon H. LaRouche, Jr.

100-107000-100

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Robert Bogin, the attorney assigned to this matter, at 202/523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis Procedures

cc: Lyndon H. LaRouche, Jr.

Prepared by RIBogin:ano 1/23/81 RB/123
Cleared by:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Ms. Gelman:

On , 1981, the Federal Election Commission determined that there is reason to believe that your committee violated section 441f of the Federal Election Campaign Act of 1971, as amended ("the Act") and section 9042(c) of Chapter 96 of Title 26, U.S. Code by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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The investigation now being conducted will be 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 investigation to be made public.

March 12, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1352

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

FEDERAL ELECTION COMMISSION

General Counsel's Factual and Legal Analysis Finding

DATE March 18, 1981

MUR NO. 1352(80)
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for LaRouche (CFL)

R. Bogin 523-4000

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

Summary of Allegations

This matter was generated from a referral by the Audit Division of matters noted during its review of the threshold submission for Presidential primary matching funds made by Citizens for LaRouche.

Factual Basis and Legal Analysis

A review of the threshold submission was undertaken in the normal course of carrying out the Commission's supervisory responsibilities under the Presidential Primary Matching Fund Account Act, 26 U.S.C. § 9031 et seq. As a result of this review, various money orders contributed to CFL and submitted to the Commission for matching funds were scrutinized. In an attempt to verify whether certain individuals contributed to CFL, the Commission discovered that certain money orders submitted for matching were not purchased or signed by the individual named on the money order. Specifically money orders in the names of Janice and Robert Hart, Paul Greenberg and William Lerch were not purchased by these individuals and the purported signature appearing on the money order was not that of the individual represented as contributing to CFL.

26 U.S.C. § 9042(c) states:

It is unlawful for any person knowingly and willfully to furnish any false, fictitious, or fraudulent evidence, books or information to the Commission under this Chapter, or to include in any evidence, books or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this Chapter.

2 U.S.C. § 441f states:

No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

Based on the information noted above, it appears that CFL knew or should have known that the funds for the money orders were supplied by others.

Based on the foregoing analysis, the Federal Election Commission has found:

Reason to believe that CFL violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c).

100-40570-57

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Citizens for LaRouche)

MUR 1352

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 16, 1981 the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1352:

1. Find REASON TO BELIEVE that CFL violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c).
2. Approve sending the letters as attached to the First General Counsel's Report dated March 12, 1981.
3. Authorize the taking of the depositions of the following individuals:

Kirby Ashley
Ronald R. Bettag
Robert Cole
Elliot R. Eisenberg
Linda Fisch
Khushro Ghandhi
Mathew C. Guice
Denise Ham

Roger Ham
David Hoffman
Melvin Klenetsky
Gerald Pechenuk
Jennifer Roe
Gerald Rose
Joyce H. Rubinstein
Therese M. Seiler
Shari D. Waffle

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

Attest:

3-16-81

Date

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

Received in Office of the Commission Secretary: 3-12-81, 11:03
Circulated on 48 hour vote basis: 3-12-81, 4:00

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

3-12-81

MUR # 1352

STAFF MEMBER(S):

R. Bogin

SOURCE OF MUR:

I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME:

Citizens for LaRouche

RELEVANT STATUTE(S):

2 U.S.C. § 441f
26 U.S.C. § 9042(c)

INTERNAL REPORTS CHECKED:

Audit Reports and Referrals

FEDERAL AGENCIES CHECKED:

None.

Generation of Matter

This matter was generated by an audit referral contained in the Threshold Audit Findings on Citizens for LaRouche.

Summary of Allegations

Citizens for LaRouche knowingly accepted contributions made in the name of others. 2 U.S.C. § 441f.

Citizens for LaRouche knowingly and willfully misrepresented a material fact relevant to a certification by the Commission. 26 U.S.C. § 9042(c).

This matter was generated by an audit referral contained in the Threshold Audit Findings on Citizens for LaRouche (Attachment I). In August, 1980, the Commission authorized an investigation pursuant to 26 U.S.C. § 9039(b) into the matters referred by the audit staff including the taking of 23 depositions. In September, 1980, the Office of General Counsel took 9 depositions in Chicago. However, the lawsuit and order in Gelman v. Federal Election Commission, Civil #80-2471 (D.D.C. 1980), precluded this Office from proceeding further with this investigation until such time as Citizens for LaRouche (CFL) was notified of the Commission's investigation pursuant to 2 U.S.C. § 437g(a)(2).

The audit referral consisted of various money orders from New York and Chicago which possessed several of the characteristics determined to be probative in MUR 1158. These characteristics include submission by different individuals of consecutively numbered money orders and a suspect sameness in some documents, and conversely a suspect difference in handwritings which should be the same.

As a result of the testimony taken by deposition, this Office has evidence that some of the money orders submitted by individuals in Chicago were not purchased by the individual named on the money order and that the signatures appearing on some of the money orders were not those of the individual represented as being the contributor. Specifically, Janice Hart testified that money orders (Exhibits 1 and 7) were neither purchased or signed by her. William Lerch testified that a money order (Exhibit 2) was neither purchased or signed by him, although he did make a contribution to CFL over the phone by credit card. In addition, Mr. Lerch did not purchase a money order (Exhibit 15) although he did sign such. However, this amount represented a contribution made by credit card at an earlier date. Furthermore, Mr. Lerch did not remember signing the money order.

Paul Greenberg testified that money orders (Exhibits 6 and 20) were not purchased or signed by him. The same applies to Robert Hart (Exhibit 21).

Other money orders did include the proper signature, nonetheless the money orders were not purchased by the purported contributor. Specifically money orders by Robert Pierce (Exhibit 4), Victoria Lacy (Exhibits 5 and 9), John Brown (Exhibit 17) and Sander Fredman (Exhibit 24) were signed by these individuals but they did not purchase the money orders and, except for Mr. Brown (Exhibit 17), did not fill in the payee line.

Mitchell Hirsch testified that he purchased and signed money orders (Exhibits 18 and 23) but did not fill in the payee line on one of the money orders (Exhibit 23).

Legal Analysis

26 U.S.C. § 9042(c) states:

It is unlawful for any person knowingly and willfully to furnish any false, fictitious, or fraudulent evidence, books or information to the Commission under this Chapter, or to include in any evidence, books or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this Chapter.

2 U.S.C. § 441f states:

No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

It appears that based on the evidence on hand, the Commission may find reason to believe that CFL violated 26 U.S.C. § 9042(c) and 2 U.S.C. § 441f with respect to those money orders that were submitted for matching funds which represented contributions to CFL from individuals who in fact did not make a contribution by money order (Exhibits 1, 2, 6, 7, 15, 20 and 21). Most of the individuals named on the money orders testified that they were volunteers for CFL working full time on the campaign. Since these individuals were intimately involved in the campaign, it would seem likely that CFL knew or should have known that the money orders were not matchable as contributions from these individuals, and that CFL or agents of CFL knowingly and willfully misrepresented material facts by submitting these money orders for matching funds. Moreover, it would appear that CFL or its agents accepted these money order contributions when it knew or should have known that the funds for the money orders were supplied by others.

It is the recommendation of the Office of General Counsel that the Commission find reason to believe that CFL violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c). Further, the Commission should reauthorize the taking of those depositions that were not completed due to the injunction of the Federal District Court. In addition to these 14 depositions, the Commission should authorize the taking of three other depositions of purported leaders of the Chicago campaign effort, Robert Cole, Jerry Rose and David Hoffman.

Recommendations

1. Find reason to believe that CFL violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c).
2. Approve the sending of attached letters.
3. Authorize the taking of the depositions of the following individuals:

Kirby Ashley
Ronald R. Bettag
Robert Cole
Elliot R. Eisenberg
Linda Fisch

Khushro Ghandhi
Mathew C. Guice
Denise Ham
Roger Ham
David Hoffman
Melvin Klenetsky
Gerald Pechenuk
Jennifer Roe
Gerald Rose
Joyce H. Rubinstein
Therese M. Seiler
Shari D. Waffle

Attachments

Attachment I
Letter to Felice Gelman/G. C. Factual & Legal Analysis/Procedures
Letter to Lyndon LaRouche
Sample Letter
Authorization (3)
Supoena

03040370150

Attachment I

C. Receipt Irregularities

One phase of our review of Committee receipts involved an examination of photocopies of contribution instruments (i.e. receipts for cash contributions, checks, money orders) for selected Committee deposits. During this process, several apparent irregularities surfaced in the December 1979 deposits. A discussion of the irregularities is supplemented by Exhibits C, D, E, F, G, H, and I which provide further detail on these receipts.

Footnote 3/ continued

Research assistant, Medical College of Virginia;
programmer, Compucon; employee, E.W. Finley, P.C.;
electrician, Singer Company; technician, Astronautics;
banking consultant, American Banking Association;
salesman, Sewing Exchange; clerk, Team Temps; house-
wife, husband unemployed; four (4) unidentified in
records and reports; one (1) self employed;
and one (1) unemployed person.

The initial pattern noted during the review of photocopies of contribution instruments was the large number of money orders issued from two (2) Chicago banking entities which were deposited in the New York headquarters account between December 10th and 17th. An examination of the serial numbers and dates of purchase associated with these money orders revealed that many instruments were consecutively numbered and purchased on or about the same date (See Exhibit C). Additional money orders with serial number patterns or linkage to the December deposits were also noted. A total of 31 money orders received from 23 contributors were examined during this review.

At this juncture, we reviewed the Committee's 1979 listing of contributions and determined that:

(a) 21 of the 23 contributors making the 31 contributions by money order were listed as "unemployed";

(b) the individuals, listed as unemployed, made contributions by money order ranging in value from \$50.00 to \$250.00;

(c) the total value of the 29 contributions from the 21 unemployed persons was \$4,425.00; and,

(d) one (1) of the individuals making contributions by money orders is listed in Committee records as a Committee representative and three (3) others are listed as campaign coordinators.

We then conducted a close examination of photocopies of money order contributions and several additional irregularities were apparent:

1. Money Orders Purchased From Illinois Banking Entities

The style of handwriting which completed the date and payee lines of 20 of the 24 instruments is extraordinarily similar to such an extent that it may have been written by the same hand. Several common characteristics of handwriting style appear on the money orders which distinguish them from the other instruments. The most prevalent characteristics are:

(a) The "Ci" in Citizens in 17 instances is detached from the "t";

(b) The "t" in Citizens in 14 instances is written as "t";

(c) The "s" in Citizens in approximately 17 instances is detached from the connected "an";


(d) The "7" in 79 is generally tilted to the right and almost touches the "9";

(e) The "f" in for is written in a distinctive style lower-case writing; and,


(f) For 15 of the 24 money orders a date line is not provided. In all 15 cases the date is rubber stamped on the money order and 12 of the 15 rubber stamped dates appear to be made from the same stamp.

Other characteristics may be developed in a more detailed comparison but those discussed above are readily apparent to the untrained eye and in some combination, appear on all 24 instruments (See Exhibit D, Instruments 1-24).

Although the identity of the person(s) who actually completed date and payee lines of the instruments is uncertain, our review of signatures appearing on the money orders revealed the characteristically distinctive "t" in an instrument signed in the name of Janice Hart (See Exhibit D, Instrument 1). We can not state with any degree of certainty that Janice Hart signed the instrument because one (1) other money order (See Exhibit D, Instrument 7) and three (3) contributions by personal check (See Exhibit E) bear the signature -Janice Hart- in a different style of handwriting. There appears to be a connection between Janice Hart or the person signing the money order in Janice Hart's name and the other 18 money orders. However, the three (3) personal checks (Exhibit E) bearing the signature Janice Hart are drawn on the joint account of Robert Hart and Janice Hart. Furthermore, the same characteristics in the signature of Janice Hart (specifically HART) on the three (3) personal checks appear to be similar with a money order that bears the signature of Robert Hart (Exhibit D, Instrument 21). The common characteristics apparent to the untrained eye in all four (4) instruments are:

(a) the "H" in Hart appears to be written as 

(b) The "r" in Hart is slanted and somewhat pointed

(c) the "t" in Hart is written a 

In addition, Committee records indicate that Robert Hart is a campaign coordinator.

2. Money Orders Purchased From New York Banking Entities

a) Chase Manhattan Bank - The handwriting style of the date and payee lines in all four (4) instruments bear several common traits and appear to have been completed by the same hand (See Exhibit F). This irregularity is similar to the discussion under 1, except the style of handwriting is that of a different hand. The unique characteristics associated with this handwriting style are:

- (1) The "D" in the December is written in the same open distinctive style.
- (2) The use of the number "7" in 79 with a bar, sometimes referred to as a European 7.
- (3) On the payee line, the "t" and "z" in Citizens and the "F" in For are written with bars across each letter.

Other characteristics may be developed but those discussed are readily apparent to the untrained eye and appear on all four (4) instruments.

b) The Bank of New York - Three (3) contributors made contributions by money orders drawn on the above bank (see Exhibit G). There does not appear to be any common characteristics in the handwriting styles when comparing the three (3) money orders; however, we have noted the following:

- (1) The money orders are consecutively numbered (WE 305 180-181-182);
- (2) The money orders are dated December 11, 1979;
- (3) The money orders are for \$200; and,
- (4) "Buffalo" is written on the lower left corner of each money order.

Furthermore, money order # WE 305-181 which bears the signature - Joyce H. Rubinstein - has the same common characteristics as the four (4) Chase Manhattan Bank money orders described in Section 2a, which are also from contributors living in the Buffalo area. Committee records indicate that Joyce H. Rubinstein is a CPD representative.

3. Signature Irregularities

Another irregularity observed in the instruments involved signature discrepancies appearing on the the money orders. Contributor signatures were examined on the 31 money orders, in conjunction with signatures of other contribution instruments attributed to the contributor. The examination revealed a distinctive variation of handwriting style in contributions from the following persons:

- (a) Janice Hart - See Exhibit D, Instruments 1, 7, and also Exhibit E. Previously discussed in Section A;
- (b) William Lerch - See Exhibit D, Instruments 2 and 15. The signatures on the two (2) contribution instruments are significantly different (presumed to be one in the same individual since the Committee submitted both instruments for matching as being contributed by William Lerch;
- (c) Melvin Klenetsky - See Exhibit D, Instruments 3 and 13. The signatures on the two (2) instruments are significantly different. Additionally, the payee lines appear to be written by different hands;
- (d) Victoria A. Lacy - The two (2) money orders (Exhibit D, Instruments 5, 9) appear to be written by the same hand, signature included, but significantly different from the handwriting on another money order and personal check bearing the signature Victoria A. Lacy (Exhibit H); and,
- (e) Paul Greenberg - The payee lines on both money orders appear to be written by the same hand, however, the two (2) signatures appear to be different (See Exhibit D, Instruments 6 and 10). Furthermore, the signature and CFL endorsement on the reverse side of a State refund check are significantly different from the previously mentioned money orders (Exhibit I).

The variation in signatures appearing on these instruments exists to such a degree that they would appear to have been written with the stroke of a different hand.

Another separate but related discrepancy was noticed in connection with the signature review. The signature and address for the money order signed in the name Paul Greenberg (See (a) above) also bears a strong similarity to the style of handwriting appearing on an instrument signed in the name Elliot R. Eisenburg (See Exhibit D, Instruments 6 and 8).

The results of the review discussed above led the Audit staff to examine contributor addresses for common patterns of residence. It was determined that 10 of the 16 individuals associated with irregular money orders issued from Chicago banking entities (See Exhibit C) resided at two (2) groups of related addresses. 4/ Further, all 10 of the individuals are listed as contributors on money orders bearing similarities of handwriting style discussed in Section A, and may be connected to the Janice Hart signature irregularities.

A review was also conducted to determine if any of the money orders were matched. The results of the review indicated that 23 instruments were submitted by the Committee for matching.

Recommendation

The Audit staff recommends that this matter be referred to the Office of General Counsel for possible WUR treatment. 5/

1/ A "related address" is a term used to describe a group of people linked either directly or indirectly by residential addresses. The link between individuals may be established directly, such as when several unrelated individuals appear to share the same address, or indirectly, such as when an individual sharing an address with another, moves to a different address shared with a different individual. A persistent link (cited here) between ten (10) individuals, linking two (2) different groups, is the handwriting identified to money orders bearing the similarities discussed in Section A and may be connected to Janice Hart signature irregularities.

2/ This matter is similar to item 3 in our memorandum referred to your office on February 6, 1980. In that case, the money orders possessed several of the characteristics mentioned above.

EXHIBIT

List of Money Orders/Contributors

<u>Exhibit Reference #</u>	<u>Name of Contributor/Occupation and Address</u>	<u>Address Group #</u>	<u>Date of Issuance</u>	<u>Date of Deposit</u>	<u>Amount</u>	<u>Money Order #</u>	<u>Comments</u>
<u>CHICAGO WATER & SEWERAGE BOARD (Chicago, IL)</u>							
1	James Hart unemployed		12-07-79	12-10-79	\$125.00	261507	
2	William Letch unemployed		12-07-79	12-10-79	55.00	261508	Also see #15
3	Robert Flomsky unemployed	I	12-07-79	12-10-79	125.00	261509	Also see #13
4	Robert Thomas unemployed	I	11-24-79	11-27-79	100.00	262247	
5	Victoria A. Lacy unemployed	I	12-10-79	12-11-79	100.00	262375	
6	Paul Greenberg unemployed	II	12-04-79	12-07-79	100.00	262394	Also see #20, listed as campaign coordinator per reports
7	James Hart unemployed		12-04-79	12-07-79	120.00	262395	
8	William B. Stenberg unemployed	II	12-10-79	12-11-79	200.00	262026	
9	Victoria A. Lacy unemployed	I	12-10-79	12-11-79	50.00	262027	
<u>COMMUNITAL BANK (Chicago, IL)</u>							
10	Shari Wattle unemployed	I	12-07-79	12-11-79	135.00	1567276	
11	Shari Wattle unemployed	I	12-07-79	12-11-79	95.00	1567277	
12	Shari Wattle unemployed	I	12-07-79	12-11-79	80.00	1567278	
13	Robert Flomsky unemployed	I	12-10-79	12-11-79	150.00	1567376	Also see #13
14	Thomas Seiber unemployed	II	12-10-79	12-11-79	250.00	1567377	Listed as Camp Coordinator per reports

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pg 8

<u>Exhibit Reference #</u>	<u>Name of Contributor/Occupation and Book</u>	<u>Address Group #*</u>	<u>Date of Issuance</u>	<u>Date of Deposit</u>	<u>Amount</u>	<u>Money Order #</u>	<u>Comment</u>
<u>CHICAGO, 1968 (CHC290, 41) continued</u>							
15	Bill Larch unemployed		11-19-79	11-21-79	200.00	1571440	Also see #2
16	Donald Isakson unemployed		12-13-79	12-17-79	380.00	1577339	
17	John H. Brown unemployed		12-13-79	12-17-79	120.00	1577340	
18	Mitchell E. Wenzel unemployed	I	12-13-79	12-17-79	200.00	1579354	Also see #23
19	Gerald Pedbrook unemployed		12-13-79	12-17-79	150.00	1579355	
20	Paul Goodburg unemployed	II	12-10-79	12-11-79	100.00	1580551	Also see #6
21	Robert Hart unemployed		12-10-79	12-11-79	250.00	1580552	Listed as Camp Coordinator per reports
<u>CHICAGO, 1968 (Chicago, 11)</u>							
22	Kerry Ashby unemployed	II	12-11-79	12-13-79	250.00	128585	
23	Mitchell Busch unemployed	I	12-11-79	12-13-79	250.00	347127	Also see #18
24	Samuel Peretz Friedman unemployed	I	12-11-79	12-13-79	250.00	871647	

pg 8

Exhibit Reference #	Name of Contributor/Occupation and Bank	Address Group #*	Date of Issuance	Date of Deposit	Amount	Wacy Order #	Comment
<u>CHINESE PROTESTANT BIBLE (New York, NY)</u>							
1	Matthew G. Glicker unemployed		12-21-79	12-26-79	\$ 100.00	89164098	
2	Leah's Mom		12-21-79	12-26-79	100.00	89164107	
3	Frank Fisch unemployed		12-21-79	12-26-79	100.00	89164116	
4	Jonathan Fox		12-21-79	12-26-79	100.00	89164125	
<u>THE BANK OF NEW YORK (New York, NY)</u>							
1	Richard (Zion) unemployed		12-11-79	12-12-79	\$200.00	WE305180	
2	Joseph H. Bulmestre unemployed		12-11-79	12-12-79	200.00	WE305181	Listed as Ote, Rep: per records
3	Walter Han unemployed		12-11-79	12-12-79	200.00	WE305182	
TOTAL					\$4,625.00		

* Address Group - See Footnote #1 for an explanation of address group.

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Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

2-340
710

No 261907

CHICAGO, ILLINOIS

Dec 7

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PAID TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$125,000.00

NOT GOOD FOR MORE THAN \$200.00

2819 W. Cullen Chicago Ill

SIGNATURE

ADDRESS

#261907 #071003403 #000073030 49

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Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

2-340
710

No 261908

CHICAGO, ILLINOIS

Dec 7

19 77

PAID TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$55,000.00

NOT GOOD FOR MORE THAN \$200.00

William Lerch

SIGNATURE

ADDRESS

#261908 #071003403 #000073030 49

③

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

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No 261909

CHICAGO, ILLINOIS

Dec 7

19 77

PAID TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$125,000.00

NOT GOOD FOR MORE THAN \$200.00

2819 W. Cullen Chicago Ill

SIGNATURE

ADDRESS

#261909 #071003403 #000073030 49

CHICAGO, ILLINOIS 60603

NO 26224

CHICAGO, ILLINOIS

Nov 23

19 79

PAY TO THE
ORDER OF

Citizens for LaRouche

④

A.T. & S.B. \$100.00 Cots *Edw. E. Price*

NOT GOOD FOR MORE THAN \$200.00

THE CHICAGO TRUST & SAVINGS BANK

4728 N. Albany, Chicago, Ill.

SIGNATURE

ADDRESS

NO 26224 NO 71003403 NO 000073030 49

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

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NO 262375

CHICAGO, ILLINOIS

Dec 10

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PAY TO THE
ORDER OF

Citizens for LaRouche

A.T. & S.B. \$100.00 Cots *Victor A. Laro*

NOT GOOD FOR MORE THAN \$200.00

THE CHICAGO TRUST & SAVINGS BANK

SIGNATURE

ADDRESS

NO 262375 NO 71003403 NO 000073030 49

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

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NO 262388

CHICAGO, ILLINOIS

Dec 10

19 79

PAY TO THE
ORDER OF

Citizens for LaRouche

A.T. & S.B. \$100.00 Cots *Victor A. Laro*

NOT GOOD FOR MORE THAN \$200.00

THE CHICAGO TRUST & SAVINGS BANK

SIGNATURE

ADDRESS

NO 262388 NO 71003403 NO 000073030 49

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PAY
TO THE
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OF

CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567276

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Citizens for La Roubie

CONTINENTAL \$135 and 00/100

Cash

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Shaw Walker
DRAWER'S SIGNATURE

✓

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CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

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PAY
TO THE
ORDER
OF

Citizens for La Roubie

CONTINENTAL \$85 and 00/100

Cash

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Shaw Walker
DRAWER'S SIGNATURE

SP1567277 NO710000691 14-44018

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PAY
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OF

CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

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Citizens for La Roubie

CONTINENTAL \$50 and 00/100

Cash

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Shaw Walker
DRAWER'S SIGNATURE

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CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603

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PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$150 and 00/100ths

Ch

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

W. H. K. T. S. H. Y.
DRAWER'S SIGNATURE

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CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603

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PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$250 and 00/100ths

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Theresa M. Seiler
DRAWER'S SIGNATURE

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CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
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PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$200 and 00/100ths

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PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

W. H. K. T. S. H. Y.
DRAWER'S SIGNATURE

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231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603

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PAY
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Citizens for LaRouche

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PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Ronald R. Betting
DRAWER'S SIGNATURE

⑆1577339⑆ ⑆07⑆000039⑆ ⑆4⑆440⑆18⑆



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231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603

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Citizens for LaRouche

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PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

John H. Brown
DRAWER'S SIGNATURE

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CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603

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Citizens for LaRouche

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\$1800000000

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Witchell F. Hinch
DRAWER'S SIGNATURE

⑆1579354⑆ ⑆07⑆000039⑆ ⑆4⑆440⑆18⑆



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

DEC 13 1979

SP 1579355

2/3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$150 and 100cts

Gerald Beckenbush

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈ 1579355 ⑈ ⑆07⑆000035⑆ ⑆4⑆440⑆8⑆

pg 16
✓

CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

DEC 10 1979

SP 1580551

2/3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$100 and 100cts

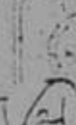
Paul Greenberg

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈ 1580551 ⑈ ⑆07⑆000035⑆ ⑆4⑆440⑆8⑆

✓



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

DEC 10 1979

SP 1580552

2/3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$250 and 100cts

Robert H. H.

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈ 1580552 ⑈ ⑆07⑆000035⑆ ⑆4⑆440⑆8⑆

p. 16

✓

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC.

NO. 128585

141 W. JACKSON BLVD. PHONE 933 2197
UNDER STATE SUPERVISION CHICAGO, ILLINOIS 60604

DEC 11 1979

DATE OF REMITTANCE
PAY TO THE
ORDER OF

Kathy Alley
Citizens for LeRouche

DOLLARS
250

EXACTLY \$250 AND NO CTS

DOLLARS

TO LINCOLN NATIONAL BANK

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC.

2425 CHICAGO, ILLINOIS 60612

142

[Signature]

128585 10710-04251 1000 420

ACME CURRENCY EXCHANGE, INC.

J. 347127

212 WEST WASHINGTON ST. FRANKLIN 2770
NORTH END OF LOBBY CHICAGO, ILLINOIS
UNDER STATE SUPERVISION

DEC 11 1979

DATE OF REMITTANCE
PAY TO THE
ORDER OF

Matt [unclear]
Citizens for LeRouche

DOLLARS
250

NOT GOOD FOR MORE THAN \$250.00

347127

ACME CURRENCY EXCHANGE, INC.

DOLLARS

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 60612

37

347127 10710-04251 1000 372

MERCHANTS CURRENCY EXCHANGE

K. 71647

30 W. JACKSON BLVD.
UNDER STATE SUPERVISION CHICAGO, ILLINOIS

DEC 11 1979

DATE OF REMITTANCE
PAY TO THE
ORDER OF

Kathy [unclear]
Citizens for LeRouche

DOLLARS
250

NOT GOOD FOR MORE THAN \$250.00

NO. 1 MERCHANTS CURRENCY EXCHANGE, INC.

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 60612

71647 10710-04251 1000 666

JAN 31 1979

Exhibit E

pg 18-

ROBERT HART
JANICE HART
2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

Jan 28 1979

216

①

Pay to the order of Citizens for LaRochelle \$ 100.00
One Hundred & no/100 Dollars
 The First National Bank of Chicago
 Chicago, Illinois 60610

Robert Hart
Janice Hart

JAN 30 1979

ROBERT HART
JANICE HART
2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

Jan 28 1979

215

②

Pay to the order of Citizens for LaRochelle \$ 100.00
One Hundred & no/100 Dollars
 The First National Bank of Chicago
 Chicago, Illinois 60610

Robert Hart
Janice Hart

③

ROBERT HART
JANICE HART
2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

NOV 02 1979

Oct 21 1975

303

Pay to the order of Citizens for LaRochelle \$ 100.00
One Hundred & no/100 Dollars
 The First National Bank of Chicago
 Chicago, Illinois 60610

Robert Hart
Janice Hart

DEC 6, 1917

ENTRADA

pg 19

Personal
Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015

CHAS

89164098

$$\frac{1-2}{219}$$
Pay to the
order of

Citizens for R. D. Moore

10:21:10 1000000000

Not valid over \$1000.

Purchaser's
Signature

Andrew C. Brown

Purchaser's Address

290 N. 2nd St. A1 = B1 = 0.10

2102 ZHANG ET AL.

084424296 : 1000000000 : 9000000000 : 74

Personal Money Order

The Chase Manhattan Bank
National Association
New York, New York 10036

[illegible]

89164107

1-2
1-2

Pay to the
order of

Citizens for Liberty

THE UNIVERSITY OF CHICAGO

Not valid over \$1000.

Purchaser's
Signature

Dr. H. H. H. H.

Publisher's
Address

143 Livingston Ave
Brooklyn NY

PVO 5 Rev. 8-19

0871641079 :C 1:000034: 900m 5' 00.5+7

Personal Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015

CHASE

83154113

100

Page 10 of 11

Citizens for a Better World

Figure 1. Schematic representation of the experimental design. The subjects were divided into two groups: the control group and the experimental group. The control group was divided into two subgroups: the control group and the control group. The experimental group was divided into two subgroups: the experimental group and the experimental group. The control group was divided into two subgroups: the control group and the control group. The experimental group was divided into two subgroups: the experimental group and the experimental group.

Normalized over 41000

2004

W. A. Brock

Purnasari's

4, Nevada Ave 2 fl. NY

PLD-2 348 473

[illegible]

p. 19

EXHIBIT

pg 21

WE305180

PERSONAL
MONEY ORDER

NEW YORK, N.Y.

Dec. 11, 1979

111
210

PAY

TO THE
ORDER OF

Citizens For La Rouché

THREE HUNDRED AND 00/100 DTS

NOT VALID OVER \$500.

Charles J. ...
Signature

3-11-8

WE305180 NO 10000184 99 8899

PERSONAL
MONEY ORDER

THREE HUNDRED AND 00/100 DTS

WE305181

NEW YORK, N.Y.

Dec. 11, 1979

111
210

PAY

TO THE
ORDER OF

Citizens For La Rouché

THREE HUNDRED AND 00/100 DTS

NOT VALID OVER \$500.

James J. ...
Signature

3-11-8

WE305181 NO 10000184 99 8899

PERSONAL
MONEY ORDER

THREE HUNDRED AND 00/100 DTS

WE305182

NEW YORK, N.Y.

Dec. 11, 1979

111
210

PAY

TO THE
ORDER OF

Citizens For La Rouché

THREE HUNDRED AND 00/100 DTS

NOT VALID OVER \$500.

ROGER W. HAM
143 LEVINGSTON AVE.
BUFFALO, N.Y. 14213

Roger W. Ham
Signature

3-11-8

WE305182 NO 10000184 99 8899

Exhibit I

01

Paul Greenberg
Pay To The Order Of
Citizens For LaRouche

CITIZENS FOR LaROUCHE
CITIZENX /

Comm X.20



State of Wisconsin
MADISON

VOID ONE YEAR AFTER DATE
DRIVER / VEHICLE REFUND

CHECK NUMBER FUND VOUCHER AGENCY SUB DESIG
10910 375 1

A 2491927

DATE RECEIVED BY THE
OFFICIAL

AUGUST 16, 1979

PAY EXACTLY SIX AND 50/100 DOLLARS

TO THE ORDER OF PAUL GREENBERG
2342 N 45 ST
MILWAUKEE

WI

*****6.50

[Signature]



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Felice M. Gelman, Treasurer
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Ms. Gelman:

On , 1981, the Federal Election Commission determined that there is reason to believe that your committee violated section 441f of the Federal Election Campaign Act of 1971, as amended ("the Act") and section 9042(c) of Chapter 96 of Title 26, U.S. Code by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be 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 investigation to be made public.

Attachment II

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Robert Bogin, the attorney assigned to this matter, at 202/523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis Procedures

cc: Lyndon H. LaRouche, Jr.

FEDERAL ELECTION COMMISSION

General Counsel's Factual and Legal Analysis Finding

DATE _____

MUR NO. 1352(80)
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for LaRouche (CFL)

R. Bogin 523-4000

SOURCE OF MUR:

I N T E R N A L L Y G E N E R A T E D

Summary of Allegations

This matter was generated from a referral by the Audit Division of matters noted during its review of the threshold submission for Presidential primary matching funds made by Citizens for LaRouche.

Factual Basis and Legal Analysis

A review of the threshold submission was undertaken in the normal course of carrying out the Commission's supervisory responsibilities under the Presidential Primary Matching Fund Account Act, 26 U.S.C. § 9031 et seq. As a result of this review, various money orders contributed to CFL and submitted to the Commission for matching funds were scrutinized. In an attempt to verify whether certain individuals contributed to CFL, the Commission discovered that certain money orders submitted for matching were not purchased or signed by the individual named on the money order. Specifically money orders in the names of Janice and Robert Hart, Paul Greenberg and William Lerch were not purchased by these individuals and the purported signature appearing on the money order was not that of the individual represented as contributing to CFL.

26 U.S.C. § 9042(c) states:

It is unlawful for any person knowingly and willfully to furnish any false, fictitious, or fraudulent evidence, books or information to the Commission under this Chapter, or to include in any evidence, books or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this Chapter.

2 U.S.C. § 441f states:

No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

Based on the information noted above, it appears that CFL knew or should have known that the funds for the money orders were supplied by others.

Based on the foregoing analysis, the Federal Election Commission has found:

Reason to believe that CFL violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c).

100-7030



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lyndon H. LaRouche, Jr.
Citizens for LaRouche
Radio City Station, P.O. Box 976
New York, New York 10019

RE: MUR 1352

Dear Mr. LaRouche:

This is to advise you that on , 1981, the Federal Election Commission found reason to believe that your committee, the Citizens for LaRouche, has violated 2 U.S.C. § 441f, a provision of the FECA of 1971, as amended, and 26 U.S.C. § 9042(c) of Chapter 96 of Title 26, U.S. Code, by knowingly accepting contributions made in the name of others and by misrepresenting material facts in the submission of contributions for matching funds.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee and for the submission of contributions for matching funds, we believe that you, as the candidate, should be made aware of this development. A copy of our letter to your Committee Treasurer is enclosed.

Under 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) this matter will remain confidential unless the Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at 202-523-4000. We have numbered this matter MUR 1352.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Letter to Committee Treasurer

Attachment III



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 1352(80)

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on at has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits 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 and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 CFR § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of \$. If the estimated mileage is incorrect, please advise this office.

Attachment IV

Please confirm your scheduled appearance with Robert Bogin on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202-523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena & Order



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following persons in connection with MUR 1352(80):

Therese M. Seiler
5637 N. Glenwood
Chicago, Ill. 60660

Gerald Rose
4127 West Belle Plaine
Chicago, IL 60641

Gerald Pechenuk
6344 Southwood, 2N
Clayton, Mo. 63105

Kirby Ashley
5637 North Glenwood
Chicago, Ill. 60660

Ronald R. Bettag
5639 A.S. Kings Highway
St. Louis, Mo. 63109

David Hoffman
1016 Arthill Place
St. Louis, Mo. 63139

Robert Cole
4119 West Belle Plaine
Chicago, IL 60641

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

16030191



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas
to the following persons in connection with MUR 1352(80):

Melvin Klenetsky
4823 North Lawndale
Chicago, Ill. 60618

Shari D. Waffle
4728 North Albany Street
Chicago, Ill. 60625

Elliot R. Eisenberg
5611 North Glenwood
Chicago, Ill. 60660

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

1970-1971



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to the following persons in connection with MUR 1352(80):

Mathew C. Guice
298 Normal Avenue
Buffalo, N.Y. 14213

Linda Fisch
421 Norwood Avenue
Buffalo, N.Y. 14222

Khushro Ghandhi
421 Norwood Avenue
Buffalo, N.Y. 14222

Roger Ham
143 Livingston Avenue
Buffalo, N.Y. 14213

Denise Ham
143 Livingston Avenue
Buffalo, N.Y. 14213

Jennifer Roe
28 Ripley Place
Buffalo, N.Y. 14213

Joyce H. Rubinstein
163 14th Street
Buffalo, N.Y. 14213

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

26 1 2 1 0 1 1 9 2

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

SUBPOENA

TO:

You are hereby ordered, pursuant to 2 U.S.C. § 437d(a)(3) and (4), to appear at _____, at _____ a.m./p.m. on _____ and to give testimony under oath and other evidence, including the furnishing of handwriting exemplars, in connection with an investigation being undertaken by this Commission pursuant to 2 U.S.C. § 437g(a)(2), concerning contributions made to Citizens for LaRouche.

Any questions concerning this subpoena should be directed to Robert I. Bogin (202-523-4000), the attorney assigned to this matter.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on the ____ day of _____ 1981.

John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James F. Schoener
Jenkins, Nystrom and Sterlacci
2033 M Street, N.W.
Washington, D.C. 20036

Dear Mr. Schoener:

Pursuant to your request, enclosed please find re-issued witness fee checks for your nine clients deposed on September 18 and 19, 1980 in Chicago.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

Nine (9) checks at \$32.50 each

8061N J135

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.		2. ARTICLES ADDRESSED TO: James Schoener	
3. ARTICLES DESCRIPTION: REGISTRATION NO. 94807		4. I have received the article described above. DATE OF DELIVERY 1-28-81 SIGNATURE [Signature]	
5. UNABLE TO DELIVER REASON:		6. UNABLE TO DELIVER REASON:	

Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

WASHINGTON, D.C. 20463

Check No. 80,813,926

SYMBOL 3004

WASHINGTON, D. C.

TREASURY

FISCAL SERVICE

DIVISION OF DISBURSEMENT



United States Treasury

15-51
000

PAY TO THE

ORDER OF

MITCHELL F. HIRSCH

MONTH DAY YEAR

01 21 81

95350001

DOLLARS CTS
\$ 80,813 25

F. E. C.

WASH DC

W1102

FELAW180 WITNESS FEE

LAROUCHE

FOR DEPOSIT ONLY
Henry M. Eaker
FEDERAL RESERVE BANK OF NEW YORK

DO NOT FOLD, SMUDGE OR MUTILATE
KNOW YOUR ENDORSEMENT - ACQUIRE IDENTIFICATION

710-0

Check No. 80,813,925

BYMBOL 3004

WASHINGTON, D. C.

15-51
000

United States Treasury

TREASURY

FISCAL SERVICE

DIVISION OF DISBURSEMENT



PAY TO THE

ORDER OF

MONTH DAY YEAR

01 21 81

95350001

SANDER PERETY FREDMAN

FEIAMI80 WITNESS FEE

LAROUCHE

DOLLARS CENTS
\$2000032 25

D F E C
WASH DC
H1102

RECEIVED BY
Henry H. Eide
FOR THE DISBURSING OFFICE

DO NOT FOLD SPINLE OR MUTILATE
KNOW YOUR ENDORSEMENT MATTER IDENTIFY

TREASURY

FISCAL SERVICE

DIVISION OF

DISBURSEMENT



PAY TO THE

ORDER OF

01 21 81

95350001

United States Treasury

15 51

000

JOHN H. BROWN JR

FEIAW180 WITNESS FEE
LAROUCHE

WASHINGTON, D. C.

Check No. 80,813,924

BYMBOL 3004

POSTAL CTS
\$000032 25

OFFICE
WASH DC
W1102

RECEIVED
Henry H. C. C. C.
BYE RIGGILL BUSHING OFFICE 14

DO NOT FOLD, SPIN, OR MUTILATE
KNOW YOUR ENDORSEMENT - SIGNATURE IDENTIFICATION

DO NOT FOLD, STAMP OR MUTILATE
KNOW YOUR ENDORSEMENT - SECURE IDENTIFICATION



1551
000

WASHINGTON, D. C.

United States Treasury

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

PAY TO THE
ORDER OF WILLIAM LERCH

01 21 81
95350001

FEELAM180 WITNESS FEE
LAROCHE

Check No. 80,813,923
BYMBDL 3004

DOLLARS CTS
\$000032 25

F E C
WASH DC
W1102

THIS CHECK IS NOT VALID
UNLESS SIGNED BY THE
TREASURER OF THE
UNITED STATES OF AMERICA
OR THE COMPTROLLER OF THE
TREASURY

7000

Check No. 80,813,922

SYMBOL 3004

WASHINGTON, D. C.

United States Treasury

TREASURY

FISCAL SERVICE

DIVISION OF DISBURSEMENT



PAY TO THE

ORDER OF

ROBERT PIERCE

01 21 81

95350001

DEBIT AMT. \$00003225

F E C WASH DC
H1102

Henry H. Eide
FOR ACCOUNT ASSISTING OFFICER

FEIAW180 WITNESS FEE
LAROCHE

DO NOT FOLD SPINDE OR MUTILATE
KNOW YOUR ENDORSEMENT -- ACQUIRE IDENTIFICATION

Check No. 80,813,921
SYMBOL 3004

WASHINGTON, D. C.

United States Treasury

PAUL GREENBERG



TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

PAY TO THE

ORDER OF

01 21 81

95350001

FEIAW180 WITNESS FEE
LAROUCHE

PORTLAND
\$000032 25

F. E. C.
WASH. DC
W1102

BY *Henry H. Cade*
BY RECORDS DISBURSING OFFICE

DO NOT FOLD, SPINLE OR MUTILATE
KNOW YOUR ENDORSEMENT - ACQUITS TO

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT



United States Treasury

WASHINGTON, D. C.

Check No. 80,813,920
SYMBOL 3004

PAY TO THE
ORDER OF JANICE HART
MONTH DAY YEAR
01 21 81

95350001

DOLLARS	CENTS
80813	25

F E C
WASH DC
W1102

FEIAN180 WITNESS FEE
LAROUCHE

STANDARD
Horse & Car
OF ALCOHOL DISTILLERS OF ALA 12

DO NOT FOLD SPINDLE OR MUTILATE
KNOW YOUR ENDORSEMENT - REQUIRE IDENTIFICATION

TREASURY

FISCAL SERVICE
DIVISION OF
DISBURSEMENT



United States Treasury

WASHINGTON, D. C.

Check No. 80,813,927

SYMBOL 3004

PAY TO THE

ORDER OF

VICTORIA A LACY

MONTH DAY YEAR
01 21 81

95350001

FEELAH180 WITNESS FEE
LAROUCHE

ENCLOSURE
\$0000032 25

D F E C
WASH DC
W1102

UNITED STATES OF AMERICA
Henry H. Crabb
STATE ALCOHOL DISTILLERS ASSOCIATION

DO NOT FOLD SPINDS OR MUTILATE
KNOW YOUR ENDORSEMENT - REFUSE IDENTIFICATION

FEDERAL ELECTION COMMISSION

internal memos, conciliation discussion/agreements
and info/

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. |
| <input checked="" type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input checked="" type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed

11/30/82

date

S. Gari



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

155-4-1353

Felice Merritt Gelman, Treasurer
Citizens for LaRouche
304 West 58th Street
New York, New York 10019

Dear Ms. Gelman:

This letter is to notify you that on August 8, 1980, the Commission decided to conduct an investigation pursuant to 26 U.S.C. § 9039(b) with respect to certain contributions made to Citizens for LaRouche. As you are aware, the Commission has responsibility for the administration and enforcement of the Presidential Primary Matching Payment Account Act. As part of that responsibility and in the course of the normal review undertaken with respect to all submissions made under the matching payment act, the Commission determined it was necessary to undertake a review of certain contributions made to your Committee. Accordingly, the Commission has authorized an investigation.

If you have any questions about this matter, please contact Robert Bogin at (202) 523-4000.

Sincerely,

A handwritten signature in dark ink, reading "Max L. Friedersdorf". The signature is written in a cursive style with a large, sweeping "M" and a long, trailing "f".

Max L. Friedersdorf
Chairman for the
Federal Election Commission

cc: James F. Schoener

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

)
 The Committee to Elect Lyndon LaRouche,)
 The National Caucus of Labor Committees,)
 Campaigner Publications, New Solidarity)
 International Press Service, and the)
 U.S. Labor Party)

MUR 398, 281,
328 and 368GENERAL COUNSEL'S REPORTBACKGROUND

On October 14, 1976, Lyndon LaRouche, the presidential candidate of the United States Labor Party, submitted a request for presidential primary matching funds with the Federal Election Commission pursuant to 26 U.S.C. § 9033. Because of questions as to whether Mr. LaRouche had met the threshold requirements, the Commission requested further information from Mr. LaRouche.

On October 28, 1976, Mr. LaRouche and his principal campaign committee, the Committee to Elect Lyndon LaRouche, (hereinafter referred to as "CTEL") filed suit in the U.S. District Court for the District of Columbia asking for an order directing the Commission to immediately certify Mr. LaRouche's eligibility to the United States Treasury. In January, 1977, the court denied the requested relief and dismissed the action without prejudice. Committee to Elect Lyndon LaRouche, et al., v. Federal Election Commission, U.S.D.C. D.C., Civil Action No. 76-2010. The case was appealed to the Circuit Court for the District of Columbia and affirmed on August 23, 1979. Committee to Elect Lyndon LaRouche, et al. v. Federal Election Commission, 613 F.2d 844 (D.C. Cir. 1979).

Even at the time of dismissal of the initial action,^y the Commission had not received copies of instruments or other written verification of contributions to meet the threshold requirements of the statute (26 U.S.C. § 9033). In expectation that such written documentation would be received, the Commission had approved on November 4, 1976, pursuant to the provisions of 2 U.S.C. § 438(a)(8), ^{1/} a matching fund threshold audit of CTCL.

The initial audit work revealed that it was necessary to expand the audit to include examination of the records of organizations associated with CTCL. CTCL occupied space and common personnel with four other organizations: Campaigner Publications, Inc.; New Solidarity International Press Service (hereinafter "New Solidarity"); The National Caucus of Labor Committees (hereinafter "NCLC"); and the United States Labor Party (hereinafter "USLP").

NCLC, a non-reporting entity, appeared to be an umbrella organization for the other four groups. It was founded in 1967 by Mr. LaRouche, who became its Chairman. Shortly after, Mr. LaRouche formed the electoral arm of the organization, USLP. This group registered with the Commission as a political committee in October, 1975, and has been filing campaign reports since that time. According to a letter received from its counsel in October, 1976, USLP set up a large number of state groups, some of which

^{1/} All citations in this report referring to the Federal Election Campaign Act are to the Act prior to the 1979 amendments.

have also filed reports with the Commission. The USLP unanimously nominated Mr. LaRouche as its presidential candidate on October 16, 1976, after Mr. LaRouche received the support of the USLP Caucus in each of 30 states.

CTEL, also a reporting entity, is the principal campaign committee of the LaRouche Presidential Campaign.

NCLC members incorporated New Solidarity and Campaigner Publications in New York in 1976. The former corporation is apparently the "intelligence" arm of NCLC. The latter corporation publishes The Campaigner magazine, a monthly publication, and New Solidarity, a biweekly paper which is published in six languages.

On December 29, 1976, the Commission approved an expansion of the CTCL audit to include the related organizations.

On January 14, 1977, the Commission also approved the direct contacting of reported CTCL contributors to verify their contributions in three states: Delaware, Massachusetts, and Wisconsin. The contacts indicated that a substantial number of contributions could not be verified because the contributor could not be located, refused to be interviewed, or denied making all or part of the donation. In one case, a contributor indicated that the contribution had not been made from his own funds.^{2/}

^{2/} This individual gave an oral affidavit to Commission Staff in which he stated in August, 1977, that a USLP representative gave him \$250 to contribute to CTCL in October 1976, in violation of 2 U.S.C. § 441f. The Commission has not named or proceeded against this individual because he was fearful of USLP's reaction to his testimony.

On the basis of the audit and field investigations conducted by the Commission pursuant to 26 U.S.C. § 9038, the Commission determined on February 10, 1977, that CTCL had not reached the matching fund threshold in verifiable contributions. No further audit work on the records of CTCL and the other organizations was performed pursuant to 26 U.S.C. § 9038, counsel having advised the FEC that CTCL would not make the records available and that the other organizations had indicated they would not consent at that time.

On February 14, 1977, Lyndon LaRouche, CTCL and LeRoy Jones (a contributor), filed a petition for review of the Commission's denial of matching funds certification in the Court of Appeals pursuant to 26 U.S.C. § 9041 which enables that court to review any agency action made under the provisions of Chapter 26. On August 23, 1979, the Court of Appeals affirmed the Commission's denial of matching funds certification. Committee to Elect Lyndon LaRouche, et al. v. Federal Election Commission, 613 F.2d 844 (D.C. Cir. 1979). The Supreme Court denied certiorari on February 19, 1980.

On April 28, 1977, the same plaintiffs filed a damage suit for redress of alleged unconstitutional harassment and actions by agents of the Federal Election Commission in connection with the verification of the matching fund submission. In October 1977, the court found that the FEC investigation was reasonable and within the statutory authority conferred by 2 U.S.C. §§ 437d and 438; and there was nothing to support any alleged violation of

Plaintiffs' common law, statutory or constitutional rights. Jones v. Unknown Agents of the Federal Election Commission, U.S.D.C., D.C., Civil Action No. 77-0732. In August 1979, the Court of Appeals affirmed part of the District Court decision but remanded the case to the District Court for further factual determinations. Jones, et al. v. Unknown Agents of the Federal Election Commission, 613 F.2d 865 (D.C. Cir. 1979). The Supreme Court denied certiorari on February 19, 1980.

FACTUAL AND LEGAL ANALYSIS

On the basis of information ascertained in the normal course of carrying out the Commission's supervisory responsibilities as well as information received during the audit and field investigations, the Commission found reason to believe that CTEL, USLP, NCLC, Campaigner Publications, and New Solidarity violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act"). The specific violations are as follows:

1. In MUR 281(77), the Commission, on October 28, 1976, found reason to believe that CTEL had violated 2 U.S.C. § 434(b) because of its failure to disclose in its reports the names and addresses and the occupation and principal place of business of contributors. Subsequently, a list of names and addresses was furnished, as part of the request for a presidential primary matching funds by Mr. LaRouche in 1976. However, a staff review of the request raised a number of factual issues as to the veracity of the information set forth therein.

2. In MUR 328(77), the Commission on February 3, 1977, found reason to believe that CTEL had committed an additional violation of § 434 because of its failure to indicate the source of a \$90,000.00 expenditure for a 1976 election eve broadcast by Mr. LaRouche. Although the expenditure was subsequently reported by the U.S. Labor Party, the accuracy of the reports is questionable.

3. IN MUR 368(77), the Commission, on February 10, 1977, found reason to believe that CTEL had violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(d). This finding was based on the fact that during the verification process of CTEL contributors for matching funds FEC investigators were unable to verify contributors of over \$100 due to the fact that the names or addresses of contributors were incorrect; the contributors did not contribute the amount that CTEL had reported in the matching fund request; contributors donated money which was given to them by another; or the reported individual did not contribute to CTEL at all.

4. In MUR 398(77), the Commission, on May 11, 1977, found reason to believe that:

a. NCLC violated 2 U.S.C. § 434 by failing to register and report with the Commission. (CTEL reported the receipt of over \$6,000 in in-kind contributions from NCLC, with no further explanation.)

b. NCLC violated 2 U.S.C. § 441a by making excessive contributions in-kind to CTEL and USLP. NCLC's in-kind contribu-

tions to CTCL exceed \$1,000 in violation of the limit set by 2 U.S.C. § 441a(a)(1)(A); and the steady accumulation of USLP debt to NCLC for rent payments over \$90,000 suggested that it might be an in-kind contribution to NCLC, which exceeds \$1,000, also a violation of the limits set by 2 U.S.C. § 441a(a)(1)(A).

c. NCLC, CTCL, and USLP violated 2 U.S.C. § 433(b)(2) by not reporting their affiliation with each other even though the organizations shared office space at 231 West 29th Street, New York, New York, and appear to have many common officers and substantial personnel overlaps.

Respondents themselves have referred to USLP and NCLC as interchangeable entities. In a memorandum of law submitted to the U.S. District Court for the Eastern District of Michigan, it is stated:

"Each plaintiff [e.g., in the law suit] is a member of a socialist political organization referred to herein as the United States Labor Party ('USLP') and also known as the National Caucus of Labor Committees ('NCLC').

d. Campaigner Publications and New Solidarity violated 2 U.S.C. § 441b by making illegal corporate contributions in-kind to USLP, CTCL and NCLC on behalf of the LaRouche Presidential campaign. In 1976, the accumulation of CTCL debt to Campaigner Publications of over \$35,000; the accumulation of USLP debt to New Solidarity of over \$8,000; and the accumulation of CTCL debt to New Solidarity of over \$20,000; and the apparent lack of an attempt to discharge

these debts by the organizations, indicates that the debts may be corporate contributions.

e. CTEL violated 26 U.S.C. § 9042(c)(1) by making false and misleading statements in reports for certifications and on audit reports.

All of the above respondents were notified of the Commission's various determinations and asked to submit responses and include certain financial documents. On June 28, 1977, after the respondents failed to respond to follow-up letters, the Commission issued subpoenas to produce documents and compel testimony from officers of the various respondents. On July 11, 1977, counsel for the Commission and the respondents stipulated to an extension of time until July 20, 1977. On July 20, 1977, the Commission received formal notification of the respondents' breach of the stipulation.

The Commission filed an Order to Show Cause on August 26, 1977. Federal Election Commission v. Committee to Elect Lyndon LaRouche, et al., U.S.D.C., D.C., Misc. No. 77-0190. On September 26, 1977, the court denied the respondents' motion to dismiss except for USLP, and ordered the other respondents (CTEL, NCLC, New Solidarity and Campaigner Publications, Inc.) to comply with the subpoenas served by the FEC. In August, 1979, the U.S. Court of Appeals affirmed the District Court decision. Federal Election Commission v. Committee to Elect Lyndon LaRouche, et al., 613 F.2d 849 (D.C. Cir. 1979). The Supreme Court denied certiorari on February 19, 1980.

FEC auditors began reviewing the respondents' records at their offices in New York on November 9, 1977, and depositions of several individuals were scheduled for February 16, 1978. A review of the records revealed that the respondents, in many cases, did not keep complete records. Numerous checks, deposit slips, invoices, bank and financial statements, loan agreements, lease agreements and statements of explanation were missing or non-existent. It did not appear that the respondents were withholding information, but rather that the campaign did not consistently adhere to standard accounting procedures. During the depositions of the individuals connected with the subject organizations, each individual declined to answer any questions on advice of counsel.

Due to the incomplete information which was available, it was determined that the best way to develop evidence was to contact thirteen CTCL contributors who submitted consecutively numbered checks to be matched for primary matching funds.

In July, 1978, an attempt to locate the individual contributors began. Cross-directories, post offices, tax assessors, and the local Board of Elections were contacted. None of the individuals could be located. In some cases, the reported addresses did not exist, or there was no record of the individual ever living at the given address.


As noted above, the three cases associated with these MURs have been in various stages of appeal and remand since 1976; only one case remains open. Because so much time has elapsed since

these matters were initiated and since the final disposition, of the one case that remains, Jones v. Unknown Agents of the Federal Election Commission, is not likely to affect the outcome of these MURs, the General Counsel's Office recommends that the Commission merge these MURs into MUR 1352 pertaining to the 1980 presidential election. A substantial amount of the information gathered in connection with these MURs concerns conduct which is similar to that under investigation in MUR 1352. Moreover, while no matching funds were issued to LaRouche in connection with the 1976 election, he did receive funds for the 1980 election. For these reasons, efforts should be concentrated on the 1980 MUR.

RECOMMENDATION

Merge MURs 398, 281, 328 and 368 into MUR 1352.

24 April 1981
Date


Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 2, 1980

MEMORANDUM

TO: THE COMMISSION

THROUGH: ORLANDO B. POTTER
STAFF DIRECTOR

FROM: BOB COSTA *APC*

SUBJECT: CITIZENS FOR LAROCHE - LETTER OF
THRESHOLD AUDIT FINDINGS

B.L. for O.B.P.

Folder
EXECUTIVE SESSION

JUL 3 1980

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OFFICE OF THE
COMMISSION SECRETARY

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C. Receipt Irregularities

One phase of our review of Committee receipts involved an examination of photocopies of contribution instruments (i.e. receipts for cash contributions, checks, money orders) for selected Committee deposits. During this process, several apparent irregularities surfaced in the December 1979 deposits. A discussion of the irregularities is supplemented by Exhibits C, D, E, F, G, H, and I which provide further detail on these receipts.

Footnote 3/ continued

Research assistant, Medical College of Virginia;
programmer, Compton; employee, E.W. Finley, P.C.;
electrician, Singer Company; technician, Astronautics;
banking consultant, American Banking Association;
salesman, Sewing Exchange; clerk, Team Tamps; house-
wife, husband unemployed; four (4) unidentified in
records and reports; one (1) self employed;
and one (1) unemployed person.

The initial pattern noted during the review of photocopies of contribution instruments was the large number of money orders issued from two (2) Chicago banking entities which were deposited in the New York headquarters account between December 10th and 17th. An examination of the serial numbers and dates of purchase associated with these money orders revealed that many instruments were consecutively numbered and purchased on or about the same date (See Exhibit C). Additional money orders with serial number patterns or linkage to the December deposits were also noted. A total of 31 money orders received from 23 contributors were examined during this review.

At this juncture, we reviewed the Committee's 1979 listing of contributions and determined that:

(a) 21 of the 23 contributors making the 31 contributions by money order were listed as "unemployed";

(b) the individuals, listed as unemployed, made contributions by money order ranging in value from \$50.00 to \$250.00;

(c) the total value of the 29 contributions from the 21 unemployed persons was \$4,425.00; and,

(d) one (1) of the individuals making contributions by money orders is listed in Committee records as a Committee representative and three (3) others are listed as campaign coordinators.

We then conducted a close examination of photocopies of money order contributions and several additional irregularities were apparent:

1. Money Orders Purchased From Illinois Banking Entities

The style of handwriting which completed the date and payee lines of 20 of the 24 instruments is extraordinarily similar to such an extent that it may have been written by the same hand. Several common characteristics of handwriting style appear on the money orders which distinguish them from the other instruments. The most prevalent characteristics are:

(a) The "Ci" in Citizens in 17 instances is detached from the "t";

(b) The "t" in Citizens in 14 instances is written as "t";

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(c) The "s" in Citizens in approximately 17 instances is detached from the connected "en";



(d) The "7" in 79 is generally tilted to the right and almost touches the "9";

(e) The "f" in for is written in a distinctive style lower-case writing; and,

(f) For 15 of the 24 money orders a date line is not provided. In all 15 cases the date is rubber stamped on the money order and 12 of the 15 rubber stamped dates appear to be made from the same stamp.

Other characteristics may be developed in a more detailed comparison but those discussed above are readily apparent to the untrained eye and in some combination, appear on all 24 instruments (See Exhibit D, Instruments 1-24).

Although the identity of the person(s) who actually completed date and payee lines of the instruments is uncertain, our review of signatures appearing on the money orders revealed the characteristically distinctive "t" in an instrument signed in the name of Janice Hart (See Exhibit D, Instrument 1). We can not state with any degree of certainty that Janice Hart signed the instrument because one (1) other money order (See Exhibit D, Instrument 7) and three (3) contributions by personal check (See Exhibit E) bear the signature -Janice Hart- in a different style of handwriting. There appears to be a connection between Janice Hart or the person signing the money order in Janice Hart's name and the other 18 money orders. However, the three (3) personal checks (Exhibit E) bearing the signature Janice Hart are drawn on the joint account of Robert Hart and Janice Hart. Furthermore, the same characteristics in the signature of Janice Hart (specifically HART) on the three (3) personal checks appear to be similar with a money order that bears the signature of Robert Hart (Exhibit D, Instrument 21). The common characteristics apparent to the untrained eye in all four (4) instruments are:

- (a) the "H" in Hart appears to be written as 
- (b) The "r" in Hart is slanted and somewhat pointed
- (c) the "t" in Hart is written a 

In addition, Committee records indicate that Robert Hart is a campaign coordinator.

2. Money Orders Purchased From New York
Banking Entities

a) Chase Manhattan Bank - The handwriting style of the date and payee lines in all four (4) instruments bear several common traits and appear to have been completed by the same hand (See Exhibit F). This irregularity is similar to the discussion under 1, except the style of handwriting is that of a different hand. The unique characteristics associated with this handwriting style are:

- (1) The "D" in the December is written in the same open distinctive style.
- (2) The use of the number "7" in 79 with a bar, sometimes referred to as a European 7.
- (3) On the payee line, the "t" and "z" in Citizens and the "F" in For are written with bars across each letter.

Other characteristics may be developed but those discussed are readily apparent to the untrained eye and appear on all four (4) instruments.

b) The Bank of New York - Three (3) contributors made contributions by money orders drawn on the above bank (see Exhibit G). There does not appear to be any common characteristics in the handwriting styles when comparing the three (3) money orders; however, we have noted the following:

- (1) The money orders are consecutively numbered (WE 305 180-181-182);
- (2) The money orders are dated December 11, 1979;
- (3) The money orders are for \$200; and,
- (4) "Buffalo" is written on the lower left corner of each money order.

Furthermore, money order # WE 305-181 which bears the signature - Joyce H. Rubinstein - has the same common characteristics as the four (4) Chase Manhattan Bank money orders described in Section 2a, which are also from contributors living in the Buffalo area. Committee records indicate that Joyce H. Rubinstein is a CFI representative.

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3. Signature Irregularities

Another irregularity observed in the instruments involved signature discrepancies appearing on the the money orders. Contributor signatures were examined on the 31 money orders, in conjunction with signatures of other contribution instruments attributed to the contributor. The examination revealed a distinctive variation of handwriting style in contributions from the following persons:

- (a) Janice Hart - See Exhibit D, Instruments 1, 7, and also Exhibit E. Previously discussed in Section A;
- (b) William Lerch - See Exhibit D, Instruments 2 and 15. The signatures on the two (2) contribution instruments are significantly different (presumed to be one in the same individual since the Committee submitted both instruments for matching as being contributed by William Lerch;
- (c) Melvin Klenetsky - See Exhibit D, Instruments 3 and 13. The signatures on the two (2) instruments are significantly different. Additionally, the payee lines appear to be written by different hands;
- (d) Victoria A. Lacy - The two (2) money orders (Exhibit D, Instruments 5, 9) appear to be written by the same hand, signature included, but significantly different from the handwriting on another money order and personal check bearing the signature Victoria A. Lacy (Exhibit H); and,
- (e) Paul Greenberg - The payee lines on both money orders appear to be written by the same hand, however, the two (2) signatures appear to be different (See Exhibit D, Instruments 6 and 20). Furthermore, the signature and CFI endorsement on the reverse side of a State refund check are significantly different from the previously mentioned money orders (Exhibit I).

The variation in signatures appearing on these instruments exists to such a degree that they would appear to have been written with the stroke of a different hand.

Another separate but related discrepancy was noticed in connection with the signature review. The signature and address for the money order signed in the name Paul Greenberg (See (e) above) also bears a strong similarity to the style of handwriting appearing on an instrument signed in the name Elliot R. Eisenburg (See Exhibit D, Instruments 6 and 8).

The results of the review discussed above led the Audit staff to examine contributor addresses for common patterns of residence. It was determined that 10 of the 16 individuals associated with irregular money orders issued from Chicago banking entities (See Exhibit C) resided at two (2) groups of related addresses. 4/ Further, all 10 of the individuals are listed as contributors on money orders bearing similarities of handwriting style discussed in Section A, and may be connected to the Janice Hart signature irregularities.

A review was also conducted to determine if any of the money orders were matched. The results of the review indicated that 23 instruments were submitted by the Committee for matching.

Recommendation

The Audit staff recommends that this matter be referred to the Office of General Counsel for possible MUR treatment. 5/

4/ A "related address" is a term used to describe a group of people linked either directly or indirectly by residential addresses. The link between individuals may be established directly, such as when several unrelated individuals appear to share the same address, or indirectly, such as when an individual sharing an address with another, moves to a different address shared with a different individual. A persistent link (cited here) between ten (10) individuals, linking two (2) different groups, is the handwriting identified to money orders bearing the similarities discussed in Section A and may be connected to Janice Hart signature irregularities.

5/ This matter is similar to item 3 in our memorandum referred to your office on February 6, 1980. In that case, the money orders possessed several of the characteristics mentioned above.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Rochelle Ascher 61 Westover Hills Blvd. Richmond, VA	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9/10/79	\$ 1180.24	\$ -0-	\$ 1180.24
NATURE OF OBLIGATION (Details of Debt): Subsistence & Lodging charged to charge card, Arlington, VA				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Rochelle Ascher 461 Westover Hills Richmond, Va. 23225	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 4411.96	\$ 1698.43	\$ 2713.53
NATURE OF OBLIGATION (Details of Debt):				
---	Balance from previous quarter	1180.24		
6/9	M/M LaRouche, S. Mendes, air ticket & Det-Chi-LaCrosse-Chi-Frankfur- 12/9	3031.11		
8/9	Finance charge	200.61	4411.96	

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Karen Brubaker 2758 No. 48th St. Chicago, Ill.	8/1/79	\$ 1742.15	\$ -0-	\$ 1742.15
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Car rental charged to charge card, Chicago, Ill.				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Karen Brubaker 2758 N. 48th St. Milwaukee, Wisc. 53210	(see Below)	\$ 1742.15	\$ 0.00	\$ 1742.15
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Balance from previous quarter 1742.15				

3 Jan 1961

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Full Name, Mailing Address and ZIP Code of Debtor or Creditor			Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
John Covici 54 Hillside Ave. NY NY 10040			(see below)	\$ 1616.00	\$ 591.52	\$ 1024.48
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other						
NATURE OF OBLIGATION (Details of Debt):						
10/10	WerBell (Atl-Det-NY-Atl) Delta 10/4				309.00	
10/10	R. Magraw, R. Kay (Bsn-NY) Delta				96.00	
10/10	S. Mendez (Manch-NY) Delta 10/10				49.00	
10/11	Salisbury (NY-Manch) Delta 10/11				93.00	
10/17	Kalintgis, Hammerman, White (NY-Manch) DL				294.00	
10/17	E. Bowd (NY-Manch) 10/17				98.00	
11/18	WerBell & sister (Atl-NY-Mkt-Atl) DL				672.00	\$ 1616.00

Enclosed
are the
original
copies of the
invoices

Joseph D'Urso

C3

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Joseph D'Urso 1285 N. Rademacher Detroit, Mi.	(see below)	\$ 1017.55	\$ -0-	\$ 1017.55
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
8/6/79 Gas (local travel)	17.55			
8/76 Lodging, Michigan Inn	<u>1000.00</u>	1017.55		

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Joseph D'Urso 1285 N. Rademacher Detroit, Mi.	(see below)	\$ 1279.55	\$ 0.00	\$ 1279.55
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
---	Balance from previous quarter	1017.55		
9/9	Gas	10.00		
10/2	M/M LaRouche, S. Mendez, E. Boyd (Det-Clevel)	<u>252.00</u>	1279.55	

521 - Eisenberg

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Elliot Eisenberg 5611 N. Glenwood Chicago, Ill 60660	Date (month, day, year) (see attached sheet)	Amount of Original Debt, Contract, Agreement or Promise \$ 3378.34	Cumulative Payment To Date \$ 0.00	Outstanding Balance at Close of This Period \$ 3378.34
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 1/31/80

Creditor: Elliot Eisenberg

Balance from previous quarters:		
Expenses incurred this quarter:		
11/4	Staff lodging (Chi) Continental Plaza	1754.58
9/22	R. Kay (Chi-Bsn) UA	129.00
9/22	R. Magraw (same)	129.00
9/22	L. LaRouche (same)	155.00
9/22	H. Mletsko (same)	129.00
9/22	S. Thompson (same)	129.00
9/22	S. Mender (same)	155.00
9/22	H. LaRouche (same)	155.00
11/3	Bismarck Hotel (Chi) room rental	642.36
TOTAL OBLIGATION TO DATE		3378.34

Jeffrey Forrest

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Debtor Name, Mailing Address and ZIP Code of Debtor or Creditor		Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Balance at Close of This Period
Jeffrey Forrest New York, NY		(see below)	\$ 552.00	\$ -0-	\$ 552.00
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other					
5/23/79 Air fare NY-Detroit, NY for one				158.00	
5/25/79 Air fare Denver-NY for one				170.00	
5/29/79 Air fare NY-Seattle for one				224.00	
			TOTAL	\$ 552.00	

5/23/79
5/25/79
5/29/79

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Origin Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jeffrey Forrest 217 Haven New York, NY	(see attached sheet)	\$ 3227.00	\$ 222.46	\$ 3004.54
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt).				
(Various; see attached sheet)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 10/10/79

Creditor: Jeffrey Forrest

Expenses incurred previous quarters: \$ 552.00
Expenses incurred this quarter:

Air tickets--

R. Magraw (NY-Manchester, NH-NY) 8/28	90.00
R. Moore (Buf-Albany-Phila; Wash, DC-Buf) 8/5	207.00
R. Moore (Wash, DC-Atlanta-Jacksonville, FL-Atl-Buf) 9/12	220.00
D. Goldman (NY-Chi-LaCrosse,Wisc-Chi- NY) 9/11	246.00
L. Scanlon (Wash, DC-Chi) 9/12	102.00
M. Brown (Wash, DC-Detroit) 9/12	75.00
Mssrs. Sneider & Mishra (NY-Wash, DC- NY) 9/12	188.00
R. Magraw, S. Pettingell, E. Boyd (Detroit-Chi-LaCrosse-Chi-NY) 8/7	561.00
W. Hamerman (NY-Buf-Roch-NY) 8/10	109.00
A. Salisbury (Det-San Francisco) 8/2	229.00
P. Glumaz (Rochester-Chi-Los Angeles) 8/17	197.00
M/M Hamerman (NY-Detroit-Lansing, MI- Cleveland-NY) 8/24	340.00
P. Goldstein (NY-Los Angeles) 8/22	108.00

TOTAL INCURRED OBLIGATION \$ 3,227.00

AGH Name, Mailing Address and ZIP Code of Debtor or Creditor M Jeffrey Forrest 217 Haven Ave. NY NY 10032			Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			(see below)	\$ 3184.66	\$ 1117.34	\$ 2067.32
NATURE OF OBLIGATION (Details of Debt)						
---		Balance from previous quarter		3004.54		
10/20		R. Magraw (Det-Chi-NY)		169.00		
		Interest		<u>11.12</u>	3184.66	

Gregory Garnier

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Gregory Garnier 1746 No. 53rd St. -- Milwaukee, Wi.	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
(see below)		\$ 899.78	\$ -0-	\$ 899.78
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
3/13-8/30: Travel & subsistence, Wisconsin tour				
One air fare (Mil-LaCros-Minn-LaCros-Minn-Des Moines-Milw)			332.00	
Car rental & gas			217.00	
Lodging & subsistence			251.95	
			98.80	\$ 899.78

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Gregory Garner 1746 N. 53rd St. Milwaukee, Wisc. 53208	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
(see below)		\$ 1409.59	\$ 0.00	\$ 1409.59
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt): balance from previous Quart.				
9/13	Mtg. room, Stoddard Hotel, LaCrosse, WI	259.75		
9/21	Lodging, Valley Motel, Green Bay, WI	23.81		
9/25	S. Cook (Milw-LaCrosse)	53.00		
9/28	Tickets (LaCrosse-Madison-Milw)	54.00		
9/28	National car rental, LaCrosse	47.85		
9/28	Lodging, Stoddard Hotel, LaCrosse	71.40		1409.59

Laurence Gray

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Laurence Gray New York, NY	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 7692.11	\$ 37.22	\$ 7654.89
NATURE OF OBLIGATION (Details of Debt): (Air travel: see-attached memo) ← <i>no memo located</i>				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Laurence Gray 200 E. 27 St. New York, NY	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 7692.11	\$ 1368.99	\$ 6323.12
NATURE OF OBLIGATION (Details of Debt): Balance due from expenditures reported in 7/10/79 quarterly report				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Laurence Gray 200 East 27th St. NY NY	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 6323.12	\$ 1202.80	\$ 5120.32
NATURE OF OBLIGATION (Details of Debt): Balance due from previous quarter 6323.12				

Marjorie Mazel

17

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Marjorie Mazel Hecht New York, NY	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
(see below)		\$ 5067.00	\$ 1453.00	\$ 3600.00
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
3/16/79 Midwest-West tour (LaRouche +4: NY-DET-St. Louis-Chicago-Los Angeles-Washington, D.C.) Air fares \$2940.00 4/6/79 LaRouche + 2 air fare, NY-Paris 1651.00 4/3/79 One air fare NY-Bozota-NY 476.00 TOTAL \$5067.00				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Marjorie Mazel Hecht 251 W. 87 St. New York, NY 10024	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
(see sheet)		\$ 8521.46	\$ 4337.08	\$ 4184.38
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 10/10/79

Creditor: Marjorie Mazel Hecht

Expenses incurred previous quarters: \$ 5,067.00

Expenses incurred this quarter:

Air tickets--

L. LaRouche, S. Mendez (Chi-St. Louis-Chi) 7/24 318.00

Same (NY-Atlanta-Chi-Detroit) 7/18 992.00

F. Sober (NY-Chi-NY) 7/18 202.00

S. Pettingell, E. Boyd (NY-Chi-Detroit) 7/18 300.00

R. Greenberg (Chi-Detroit) 7/24 49.00

L. Scanlon (Chi-St. Louis-Chi) 7/24 98.00

S. Pettingell, E. Boyd, R. Leebove (Chi-St. Louis-Chi) 7/24 253.00

R. Kay (NY-Kansas City) 9/17 154.00

M. Mletzko (Luxembourg-NY-Lux) 9/17 553.00

E. Boyd, (C. Curtis (Kansas City-NY) 308.00

Avis Car Rental, 7/19 222.46

TOTAL OBLIGATION TO DATE \$ 8,521.46

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Marjorie Mazel Hecht 251 W. 87th St. NY NY		Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		(See below)	\$ 4817.62	\$ 1135.30	\$ 3682.32
NATURE OF OBLIGATION (Inclusive of Detail)					
---	balance from prev quart.		4184.38		
8/27	M/M LaRouche, S Pettingell (Indiap.-Chi-Port OR) Ameri.,				
	United		594.00		
	Interest		39.24		
					4817.62

10. MARSHAL KOKINDA

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Marsha Kokinda RD 1, Knapp Road Mechanicville, NY 12118		(see below)	\$ 924.38	\$ 119.00	\$ 805.38
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other					
NATURE OF OBLIGATION (Details of Debt)					
3/30/79 Car rental		\$119.38			
6/6/79 One air fare, Mex.-NY		198.00			
6/8/79 One air fare, NY-Richmond-Casper, WY-Denver-Casper-Denver-San Fran		367.00			
6/18/79 One air fare, NY-Cleve-NY		132.00			
6/21/79 One air fare, Los Ang.-NY		108.00			

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Marsha Kokinda 1707 Columbia Rd. Washington, DC		(see below)	\$ 939.40	\$ 751.92	\$ 187.48
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other					
NATURE OF OBLIGATION (Details of Debt)					
Incurred prev. quarter:		924.38			
Interest on credit card (Jun-Aug)		13.94			
(Jun-Sep)		1.08	939.40		

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Marsha Kokinda 1707 Columbia Rd. Washington, DC 20009		(see below)	\$ 2455.43	\$ 1109.61	\$ 1285.87
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other					
NATURE OF OBLIGATION (Details of Debt)					
--- balance from previous quarter		187.48			
7/9 M/M LaRouche, S. Mendes					
Lufthansa (Chi-Frankfurt)		2268.00			
		2455.43			

Melvin Johnson

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Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Melvin Johnson Chicago, Ill.				
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 3738.68	\$ -0-	\$ 3738.68
NATURE OF OBLIGATION (Details of Debt)				
5/30/79 One air fare, San Fran.-Hermosillo, Mex.-Los Angeles				\$198.68
5/25 One air fare, Mexico City-NY-Detroit-Chicago- Los Angeles-Mexico City				498.00
Hotel rooms + subsistence, LaRouche+3 (Michigan Inn, Southfield, MI)				3000.00
Meals (Lyttens, Chicago, Ill.)				42.00

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Melvin Johnson 2219 W. Gidding St. Chicago, Ill.				
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	(see below)	\$ 5738.68	\$ 4000.00	\$ 1738.68
NATURE OF OBLIGATION (Details of Debt)				
Balance due from prev. report	3738.68			
Hotel room rentals, Chicago, 8/79	2000.00	5738.68		

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Melvin Johnson 2219 W. Biddings St. Chicago Ill 60625				
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$ 1738.68	\$ 0.00	\$ 1738.68
NATURE OF OBLIGATION (Details of Debt)				

12 Michael Smedberg

VE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor		Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Michael Smedberg 261 Seaman Ave., NY NY 10034		(See below)	\$2495.00	\$ 731.24	\$1763.76
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other					
NATURE OF OBLIGATION (Details of Debt)					
2/27	5 AA tickets \$2473; M/MlaR., S. Pettingell				
8/27	S. Mendez, P. Goldstein, (NY-Chi-Mex Cy)				1235.00
7	4 Del. tkts \$663; M/MlaR., E. Boyd,				
8/27	S. Pettingell (Atl-Indianap.)				344.00
11/10	S. Thompson (Atl-NY)				103.
	AA tkts M/M laR., Mendez, Pike, Andromidas				813.00
	(Del-SES)				
					2495.00

I certify that the above is a true and correct statement of the account of the debtor.

Michael Smedberg

Martin Simon

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Martin Simon PO Box 14403 Portland, OR 97214	(see below)	\$ 508.12	\$ -0-	\$ 508.12
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
4/27/79 Banquet room rental (Thunderbird Inn, Portland)			\$288.45	
6/22/79 Same (same)			170.77	
6/16/79 & 4/18/79 Printing flyers			16.85	
Miscellaneous postage & eqpt. rental			32.05	
TOTAL			508.12	

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Martin Simon PO Box 14403 Portland, OR 97214	(see below)	\$ 508.12	\$ -0-	\$ 508.02
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Incurred last quarter				

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Martin Simon 2514 SE Ankey Portland, Oregon	(See below)	\$ 1403.84	\$ 0.00	\$ 1403.84
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
balance from previous quart.		508.12		
12/9	Portland Fundraiser	398.50		
8/13-20	Printing & Postage	23.21		
11/9	Mtg. room Lake Oswego, OR	130.		
11/16	Meals	165.85		
11/7	leaflets OR	124.80		
11/7	Postage	42.46		
			1403.84	

H. JAMES W. THILL

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
David W. Thill 260 East High St. Manchester, N.H.	(see attached sheet)	\$ 3507.65	\$ 2000.00	\$ 1507.65
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 1/31/80

Creditor: David W. Thill

Balance from previous quarters: \$0.00
Expenses incurred this quarter: \$3507.65

7/13-23/79	\$2004.50	LaRouche and entourage lodging--Michigan Inn--Southfield, Mich.
8/3/79	9.10	Lodging--Queen City Motor Inn--Manchester, N.H.
9/15/79	50.00	Lodging--Queen City Motor Inn--Manchester, N.H.
9/22/79	127.60	Lodging--Uptown Motel--Manchester, N.H.
9/24/79	21.20	Lodging--Uptown Motel--Manchester, N.H.
9/29/79	21.20	Lodging--Uptown Motel--Manchester, N.H.
10/1/79	82.96	Auto rental--Thrifty Rent-A-Car--Rochester, N.H.
10/13/79	595.00	Auto rental--Avis Rent-A-Car--Manchester, N.H.
11/11/79	362.00	Fundraiser room rental--Greenwich Steak House--Nashua, N.H.
11/21/79	221.00	Auto rental--Budget Rent-A-Car--Manchester, N.H.
11/23/79	13.09	Subsistence--Ferretti's Restaurant--N.H.

15 Andrew Wilson
Ga.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Andrew Wilson Atlanta, GA	(see below)	\$992.52	\$-0-	\$992.52
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
5/18/79	One air fare, Atlanta-Jacksonville-Atlanta		\$96.00	
5/18	One air fare, Atlanta-Jacksonville-Tampa-Atlanta		150.00	
			<u>746.52</u>	
				\$992.52

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Andrew Wilson 145 Peachtree Park Dr. Atlanta, Ga.	(see attached sheet)	\$ 3187.52	\$ 14723 9	\$ 1715.13
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 10/10/79

Creditor: Andrew Wilson

Expenses Incurred previous quarters: \$ 992.52
Expenses Incurred This Quarter:

Air tickets--	
Mi. Schlanger (Atlanta-Jacksonville-Atl)	100.00
Ma. Schlanger (same) (both 7/15)	100.00
H. Schlanger (Atlanta-Sarasota-Atlanta) 7/16	146.00
M/M Guillot (N. Orleans-Atlanta-MSY) 7/18	268.00
R. Bartelt (Fayetteville-Atl-Fayette) 7/18	142.00
D. Cochran (Orlando-Atl-Orlando) 7/18	128.00
W. Engdahl (Atl-NY) 7/23	97.00
S. Schlanger (Atl-Ft. Laud.-Atl) 7/23	166.00
M. Schlanger (same)	166.00
H. Guinde (Atl-NY) 8/8	103.00
T. Pike (Atl-San Francisco) 8/8	224.00
M. Mletsko (Atl-NY) 8/8	206.00
H. Schlanger (Atl-San Anton.-Dallas-Austin- Houston-Atl) 8/17	
	<u>349.00</u>

TOTAL OBLIGATION TO DATE

\$ 3,137.52

(Carry total to page 24, Schedule C, in support of Line 13)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor Andrew Wilson 145 Peachtree Park Drive Atlanta, GA	Date (month, day, year) (see below)	Amount of Original Debt, Contract, Agreement or Promise \$6539.47	Cumulative Payment To Date \$ 2901.05	Outstanding Balance at Close of This Period \$ 3638.42
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt): (see attached)				

Supplementary Schedule for Section C, Debts and Obligations
For Quarterly Report 1/31/80

Creditor: Andrew Wilson

Balance from previous quarters: 1715.13
Expenses incurred this quarter:

8/7/79 M. Schlanger (Atl-Jksvl-Atl) (Eastern)	\$106.00
9/12/79 LaRouche and entorage--Tower Place Hotel--Atlanta	
8/22/79 M. Brown (Atl-Detr) (Delta)	1233.67
8/22/79 R. Moore (Atl-Buff)	89.00
8/29/79 H. Schlanger (Atl-Hous) (Delta)	104.00
9/5/79 R. Macraw (Jksvl-Atl) (Eastern)	175.00
9/9/79 R. Moore (Atl-Buff) (Eastern)	42.00
9/11/79 C. Curtis (Was-Atl-Jksvl) (Eastern)	104.00
9/14/79 Mender, Boyd, Curtis (Atl-Hous) (Eastern)	97.00
9/24/79 H. Schlanger, C. Winslow (Atl-Hous) (Eastern)	306.00
9/25/79 H. Schlanger (Atl-Mia-Atl) (Delta)	116.00
10/7/79 H. Schlanger (Atl-Ft Laud) (Delta)	175.00
10/10/79 H. Schlanger (Ft Laud-Atl-Hous-Atl) (Eastern)	73.00
10/30/79 H. Schlanger (Detr-Hous-Dal) (Delta)	246.00
10/27/79 Meeting Room--Georgian Oaks--Ga.	196.00
12/3/79 S. Schlanger (Ft Laud-FBI-Jksvl-Mia)	467.17
12/6-8/79 H. Schlanger (Atl-Ft Laud-Mia-Tam-Atl) (Delta)	143.00
12/8-9/79 U. Parpart (Mia-Tam-Atl-NY) (NA)	225.00
12/14-24/79 C. Winslow (Atl-Ft Laud-Atl)	163.00
12/17/79 S. Schlanger (Ft Laud-Atl-Ft Laud) (Delta)	163.00
12/17/79 B. Winslow (Atl-Ft Laud-Atl) (Eastern)	115.50
12/13-24/79 H. Schlanger (Atl-Ft Laud-Atl) (Delta)	126.00
12/27/79-1/1/80 H. Schlanger (Atl-Detr-Atl) (Delta)	168.00
	121.00

Citizens for LaRouche

Box 976, Radio City Station, New York, N.Y. 10019

Co-chairmen

Allen Salisbury

Carol White

TO: BRUCE SHELTON, Federal Elections Commission Audit Staff

FROM: Felice Gelman, Treasurer

Treasurer

Felice Gelman

April 24, 1980

RE: Overseas Travel Expenses

Paid by Melvin Johnson:

2-1 San Francisco-Mexico-Los Angeles (traveller: Pat Dolbeare)

6-2 Mexico-NY-Detroit-Chicago-Los Angeles-Mexico (traveller: Marivillia Carrasco)

Purpose of both to explore options and begin operation of organizing Mexican-American vote, oriented to states with substantial such populations (California, Arizona, New Mexico, Texas, Colorado, Illinois).

Paid by Marsha Kokinda:

2-2 Mexico-NY (traveller: Fernando Quijano).

Purpose was consultation on candidate's program relating to foreign relations (Mexico).

4-1 Chicago-Frankfurt (travellers: candidate and party).

Purposes: (1) meeting with Americans in Europe representing potential supporters of campaign; (2) (primary purpose) exploring foreign policy issues (European) for developing campaign program.

Paid by Marjorie Marel Hecht:

2-1 NY-Bogota-NY (traveller: Dennis Small). Purpose: Investigation of illegal narcotics traffic for development of campaign position.

4-4 NY-Paris (4/6) (traveller: LaRouche and party). Purpose: Same as above European trip, point (2).

2-2 Luxembourg-NY-Luxembourg (traveller: M. Miesko). Purpose: Security consultation relating to candidate's campaign travel and appearances.

Citizens for LaRouche

Box 976, Radio City Station, New York, N.Y. 10019

Co-chairmen

Allen Salisbury

Carol White

Gelman to Shelton, Overseas Travel

(page 2)

Treasurer

Felice Gelman

Paid by Rochelle Ascher:

6-7 Detroit-Chicago-LaCrosse-Chicago-Frankfurt (traveller:
Candidate and party).

Purpose: Same as European travel noted above (foreign
policy program development for campaign).

Paid by Michael Smedberg:

6-1 NY-Chicago-Mexico City (traveller: Candidate and party).

Purpose: Consultation with Mexican officials on U.S.-
Mexican foreign policy questions for further development
of campaign positions.

EXHIBIT C

List of Money Orders/Contributors

<u>Exhibit B Reference #</u>	<u>Name of Contributor/Occupation and Bank</u>	<u>Address Group #*</u>	<u>Date of Issuance</u>	<u>Date of Deposit</u>	<u>Amount</u>	<u>Money Order #</u>	<u>Comment</u>
<u>ARMED/ARMED TRUST & SAVINGS BANK (Chicago, IL)</u>							
1	James Bart unemployed		12-07-79	12-10-79	\$125.00	261907	
2	William Birch unemployed		12-07-79	12-10-79	55.00	261908	Also see #15
3	Belvin Klenetsky unemployed	1	12-07-79	12-10-79	125.00	261909	Also see #13
4	Robert Pierce unemployed	1	11-21-79	11-27-79	100.00	262247	
5	Victoria A. Lacy unemployed	1	12-10-79	12-11-79	100.00	262375	
6	Paul Greenberg unemployed	11	12-04-79	12-07-79	100.00	262394	Also see #20, listed as campaign coordin- ator per reports
7	James Bart unemployed		12-04-79	12-07-79	120.00	262395	
8	Elliot R. Eisenberg unemployed	11	12-10-79	12-11-79	200.00	262826	
9	Victoria A. Lacy unemployed	1	12-10-79	12-11-79	50.00	262827	
<u>CONFIDENTIAL BANK (Chicago, IL)</u>							
10	Shari Mattle unemployed	1	12-07-79	12-11-79	135.00	1567276	
11	Shari Mattle unemployed	1	12-07-79	12-11-79	85.00	1567277	
12	Shari Mattle unemployed	1	12-07-79	12-11-79	80.00	1567278	
13	Belvin Klenetsky unemployed	1	12-10-79	12-11-79	150.00	1567376	Also see #3
14	Theresa Heller unemployed	11	12-10-79	12-11-79	250.00	1567377	Listed as Camp. Coordinator per reports

Exhibit D Reference #	Name of Contributor/Occupation and Bank	Address Group #A	Date of Issuance	Date of Deposit	Amount	Money Order #	Comment
CONFIDENTIAL BANK (CHICAGO, IL) continued							
15	Bill Lerch unemployed		11-19-79	11-21-79	200.00	1571440	Also see #2
16	Ronald Bettag unemployed		12-13-79	12-17-79	180.00	1577339	
17	John H. Brown unemployed		12-13-79	12-17-79	120.00	1577340	
18	Mitchell E. Hirsch unemployed	I	12-13-79	12-17-79	200.00	1579354	Also see #23
19	Gerald Beckman unemployed		12-13-79	12-17-79	150.00	1579355	
20	Paul Greenberg unemployed	II	12-10-79	12-11-79	100.00	1580551	Also see #6
21	Robert Hart unemployed		12-10-79	12-11-79	250.00	1580552	Listed as Camp. Coordinator per reports
EDDYVILLE NATIONAL BANK (Chicago, IL)							
22	Kirby Ashley unemployed	II	12-11-79	12-13-79	250.00	128585	
23	Mitchell Hirsch unemployed	I	12-11-79	12-13-79	250.00	347127	Also see #18
24	Garber Bretz Friedman unemployed	I	12-11-79	12-13-79	250.00	871647	

Exhibit F Reference #	Name of Contributor/Occupation and Bank	Address Group #*	Date of Issuance	Date of Deposit	Amount	Money Order #	Comment
	CHASE MANHATTAN BANK (New York, NY)						
1	Matthew C. Garice unemployed		12-21-79	12-26-79	\$100.00	89164098	
2	Dorine Han		12-21-79	12-26-79	100.00	89164107	
3	Linda Fisch unemployed		12-21-79	12-26-79	100.00	89164116	
4	Jennifer Roe		12-21-79	12-26-79	100.00	89164125	
Exhibit G	THE BANK OF NEW YORK (New York, NY)						
1	Giuseppe Giandini unemployed		12-11-79	12-12-79	\$200.00	WE305180	
2	Joyce H. Redenstein unemployed		12-11-79	12-12-79	200.00	WE305181	Listed as Onie. Rep. per records
3	Reaper Han unemployed		12-11-79	12-12-79	200.00	WE305182	
				TOTAL	\$4,625.00		

* Address Group - See Footnote #4 for an explanation of address group.

D

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

No 261907

CHICAGO, ILLINOIS

Dec 7 19 79

PAY TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$125 and 00 Cts. James Hart

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

2819 W. Cullum, Chicago, Ill

SIGNATURE
ADDRESS

261907 # 0071003403 # 000073030 # 49

②

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

No 261908

CHICAGO, ILLINOIS

Dec 7 19 79

PAY TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$55 and 00 Cts. William Leach

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

SIGNATURE

261908 # 0071003403 # 000073030 # 49

ADDRESS

③

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

No 261909

CHICAGO, ILLINOIS

Dec 7 19 79

PAY TO THE
ORDER OF

Citizens for La Roche

A.T. & S.B. \$125 and 00 Cts. William Leach

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

SIGNATURE

261909 # 0071003403 # 000073030 # 49

ADDRESS

(4)

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

N^o 26224

CHICAGO, ILLINOIS

Nov 23

19 79

PAY TO THE
ORDER OF

Citizens for LaRouche

A.T. & S.B. \$100 and 00 Cts

Robert E. Price

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

4728 N. Albany, Chicago, Ill.

SIGNATURE

262247 # 1071003405 # 000073030

19

ADDRESS

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

N^o 262375

CHICAGO, ILLINOIS

Dec 10

19 79

PAY TO THE
ORDER OF

Citizens for LaRouche

A.T. & S.B. \$100 and 00 Cts

Victoria A. Lamm

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

262375 # 1071003405 # 000073030

49

ADDRESS

(6)

Amalgamated Trust & Savings Bank

2-340
710

CHICAGO, ILLINOIS 60603

N^o 262394

CHICAGO, ILLINOIS

19 79

PAY TO THE
ORDER OF

Citizens for LaRouche

A.T. & S.B. \$100 and 00 Cts

Robert E. Price

NOT GOOD FOR MORE THAN \$200.00

AMALGAMATED TRUST & SAVINGS BANK

4728 N. Albany, Chicago, Ill.

SIGNATURE

262394 # 1071003405 # 000073030

49

ADDRESS

⑦

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

12/07

No 26239

CHICAGO, ILLINOIS

1979

PAY TO THE
ORDER OF

Citizens for La

NOT GOOD FOR MORE THAN \$200.00

AT & S.B. \$1200.00

Orville Hart

281 W. Cullum Ave

26239 # NO 74003405 # 000073030

49 Chicago 60614

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

2-340
710

No 262826

CHICAGO, ILLINOIS

1977

PAY TO THE
ORDER OF

Citizens for La

NOT GOOD FOR MORE THAN \$200.00

A.T. & S.B. \$200.00

Orville Hart

511 W. Glenwood Chicago

262826 # NO 74003405 # 000073030

49

Amalgamated Trust & Savings Bank

CHICAGO, ILLINOIS 60603

2-340
710

No 262827

CHICAGO, ILLINOIS

Dec 10

1977

PAY TO THE
ORDER OF

Citizens for La

NOT GOOD FOR MORE THAN \$200.00

A.T. & S.B. \$50.00

Victoria A. Lee

262827 # NO 74003405 # 000073030

49



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO DEC 7 1979
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567276

2-3
710PAY
TO THE
ORDER OF*Citizens for La Roche*CONTINENTAL \$135 and 00/100
BANK*Shaw W. Wolfe*
DRAWER'S SIGNATUREPERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

557276# 0071000039# 14-44018#



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO DEC 7 1979
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567277

2-3
710PAY
TO THE
ORDER OF*Citizens for La Roche*CONTINENTAL \$65 and 00/100
BANK*C-S*PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500*Shaw W. Wolfe*
DRAWER'S SIGNATURE

557277# 0071000039# 14-44018#



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO DEC 7 1979
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567278

2-3
710TO
ORDER OF
ONLY*Citizens for La Roche*CONTINENTAL \$50 and 00/100
BANK*Shaw W. Wolfe*
DRAWER'S SIGNATUREPERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

557278# 0071000039# 14-44018#



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
221 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567376

2-3
710

13
PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$150 and 00 Cts

cl
PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Mal Klerntsky
DRAWER'S SIGNATURE

⑈1567376⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
221 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1567377

2-3
710

14
PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$250 and 00 Cts

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

Theresa M. Seiler
DRAWER'S SIGNATURE

⑈1567377⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
221 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1571440

NOV 19 1979

2-3
710

15
PAY
TO THE
ORDER
OF

Citizens for La Roche

CONTINENTAL BANK \$200 and 00 Cts

Cgo
PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

[Signature]
DRAWER'S SIGNATURE

⑈1571440⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET CHICAGO ILLINOIS 60693

SP1577339

DEC 13 1979

2-3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$130 and 00/100ths

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500*Ronald R. Betting*

DRAWER'S SIGNATURE

⑈1577339⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET CHICAGO ILLINOIS 60693

SP1577340

DEC 13 1979

2-3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$130 and 00/100ths

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500*John H. Brown Jr.*

DRAWER'S SIGNATURE

⑈1577340⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET CHICAGO ILLINOIS 60693

SP1579354

DEC 13 1979

2-3
710PAY
TO THE
ORDER
OF*Citizens for LaRouche*

CONTINENTAL BANK \$200 and 00/100ths

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500*Mitchell F. Hinch*

DRAWER'S SIGNATURE

⑈1579354⑈ ⑆07⑆000039⑆ ⑈4⑈440⑈8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1579355

DEC 13 1979

2/3
710

PAY
TO THE
ORDER OF

Citizens for LaRouche

CONTINENTAL BANK \$150 and 00 Cts

Gerald Beckenub

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈1579355⑈ ⑆071000039⑆ ⑆4⑈440⑆8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1580551

DEC 10 1979

2/3
710

PAY
TO THE
ORDER OF

Citizens for LaRouche

CONTINENTAL BANK \$100 and 00 Cts

Paul Greenberg

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈1580551⑈ ⑆071000039⑆ ⑆4⑈440⑆8⑈



CONTINENTAL BANK

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60693

SP1580552

DEC 10 1979

2/3
710

PAY
TO THE
ORDER OF

Citizens for LaRouche

CONTINENTAL BANK \$250 and 00 Cts

Robert H. H.

DRAWER'S SIGNATURE

PERSONAL MONEY ORDER
FOR AMOUNTS LESS THAN \$500

⑈1580552⑈ ⑆071000039⑆ ⑆4⑈440⑆8⑈

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC.

No 128585

141 W. JACKSON BLVD. PHONE 939-3187
UNDER STATE SUPERVISION CHICAGO, ILLINOIS 60604

DEC 11 1979

NAME OF BENEFITARY
PAY TO THE
ORDER OF

Kirby Alley
Citizens for LaRouche

DOLLARS
250
CENTS

NOT GOOD FOR MORE THAN \$250.00 UNLESS COUNTERSIGNED

EXACTLY \$250.00 AND 00 CTS

DOLLARS

TO LINCOLN NATIONAL BANK

141 W. JACKSON BLVD. CURRENCY EXCHANGE, INC.
142

2425
710 CHICAGO, ILLINOIS 710

Alvin Johnson

#128585# 00710-04251-1000 420

ACME CURRENCY EXCHANGE, INC.

J-347127

312 WEST WASHINGTON ST. FRANKLIN 2-7740
NORTH END OF LOBBY CHICAGO, ILLINOIS
UNDER STATE SUPERVISION

DEC 11 1979

NAME OF BENEFITARY
PAY TO THE
ORDER OF

Michelle Hahn
Citizens for LaRouche

DOLLARS
250
CENTS

NOT GOOD FOR MORE THAN \$250.00

EXACTLY \$250.00 AND 00 CTS

DOLLARS

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 2425
710

ACME CURRENCY EXCHANGE, INC.
37

Alvin Johnson

#347127# 00710-04251-1000 377

MERCHANTS CURRENCY EXCHANGE

K-71647

33 W JACKSON BLVD.
UNDER STATE SUPERVISION CHICAGO, ILLINOIS

NAME OF BENEFITARY
PAY TO THE
ORDER OF

Sandra Carter
Citizens for LaRouche

DOLLARS
250
CENTS

NOT GOOD FOR MORE THAN \$250.00

EXACTLY \$250.00 AND 00 CTS

DOLLARS

LINCOLN NATIONAL BANK
CHICAGO, ILLINOIS 2425
710

NO. 1 MERCHANTS CURRENCY EXCHANGE, INC.

Alvin Johnson

#71647# 00710-04251-1000 888

JAN 30 1979

ROBERT HART
JANICE HART
2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

E C I F F

Jan 28 1979

216

Pay to the
order of

Citizens of La Roche

1 s 200

Twenty and no/100

Dollars



The First National Bank of Chicago
Chicago, Illinois 60670

Robert Hart Janice Hart

⑆07⑆0000⑆3⑆

JAN 30 1979

ROBERT HART
JANICE HART
2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

Jan 28 1979

215

Pay to the
order of

Citizens of La Roche

1 s 100

Ten & no/100

Dollars



The First National Bank of Chicago
Chicago, Illinois 60670

Robert Hart Janice Hart

⑆07⑆0000⑆3⑆

ROBERT HART
JANICE HART

2519 W. CULLOM AVE., APT. 1
CHICAGO, ILL. 60618

NOV 02 1979

Oct 31 1979

383

Pay to the
order of

Citizens of La Roche

1 s 100

One Hundred & no/100

Dollars



The First National Bank of Chicago
Chicago, Illinois 60670

Robert Hart Janice Hart

⑆07⑆0000⑆3⑆

DEC 26, 1979

EXHIBIT F

Personal
Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015



CHASE

89164098

1-2
210

December 21 1979

Pay to the
order of

Citizens for LaRouche

REMAINDER \$100.00

Not valid over \$1000.

Purchaser's
Signature

William E. Guice

Purchaser's
Address

290 N. Main St. Buffalo, NY

PMO 5 Rev. 5-73

① 89164098 100210000210 900 5 00 15 17

Personal
Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015



CHASE

89164107

1-2
210

December 21 1979

Pay to the
order of

Citizens for LaRouche

REMAINDER \$100.00

Not valid over \$1000.

Purchaser's
Signature

Denise Hamer

Purchaser's
Address

143 Livingston Ave.
Buffalo NY

PMO 5 Rev. 5-73

② 89164107 100210000210 900 5 00 15 17

Personal
Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015



CHASE

89164116

1-2
210

December 21 1979

Pay to the
order of

Citizens for LaRouche

REMAINDER \$100.00

Not valid over \$1000.

Purchaser's
Signature

Chickie Pich

Purchaser's
Address

41 Norwood Ave Buffalo, NY

PMO 5 Rev. 5-73

③ 89164116 100210000210 900 5 00 15 17

EXHIBIT G

WE30518C

PERSONAL
MONEY ORDER

NEW YORK, N.Y.

Dec. 11, 1979

1-1
210

PAY

TO THE
ORDER OF

Citizens For La Roche

ONE THOUSAND TWO HUNDRED AND 00/100 DOLLARS

NOT VALID OVER \$500.

Charles J. ...
Signature

3-11-8

WE30518C

NO21000018C

99 8899

PERSONAL
MONEY ORDER

THE BANK OF NEW YORK

WE305181

NEW YORK, N.Y.

Dec 11, 1979

1-1
210

PAY

TO THE
ORDER OF

Citizens For La Roche

ONE THOUSAND TWO HUNDRED AND 00/100 DOLLARS

NOT VALID OVER \$500.

James H. ...
Signature

3-11-8

WE305181

NO21000018C

99 8899

PERSONAL
MONEY ORDER

THE BANK OF NEW YORK

WE305182

NEW YORK, N.Y.

Dec 11, 1979

1-1
210

PAY

TO THE
ORDER OF

Citizens For La Roche

ONE THOUSAND TWO HUNDRED AND 00/100 DOLLARS

NOT VALID OVER \$500.

ROGER P. HAM
143 LIVINGSTON AVE.
BUFFALO, N.Y. 14213

Roger P. Ham
Signature

3-11-8

WE305182

NO21000018C

99 8899

VICTORIA ALLEY
 MEL KLENETSKY
 4725 N. ALDER
 CHICAGO, ILL. 60645

290
 10/29 1979 0710 0340

PAY TO THE ORDER OF Citizens for La Rance \$100.00
One hundred and 00/100 DOLLARS

Antigonated
 State Bank
 Chicago Branch 60627

FROM Cash Victoria Alley
 ⑈0710⑈0340⑈

250019 70-3334
 719

DATE January 20 1982
 PAY TO THE ORDER OF Citizens for La Rance

EXACTLY 250 AND NO CTS

West Suburban Bank Victoria Alley
 LOMBARD, ILLINOIS SIGNATURE
 3523 N. Lombard
 ADDRESS

⑈3334⑈ ⑈0719⑈ ⑈3334⑈ ⑈70⑈000⑈9⑈

Exhibit I

01

Paul Greenberg
Pay To The Order Of
Citizens For LaPouche

State of Wisconsin
MADISON

VOID ONE YEAR AFTER DATE
DRIVER / VEHICLE REFUND

CHECK NUMBER FUND VOUCHER AGENCY TOL DISTRICT
A2491027 11 10910 375 1

A 2491027

FIRST NATIONAL BANK
OF MILWAUKEE

AUGUST 16, 1979

PAY TO THE ORDER OF SIX AND 50/100 DOLLARS

TO THE ORDER OF PAUL GREENBERG
2342 N 45 ST
MILWAUKEE

WT

*****50

Paul Greenberg

DEC. 26, 1979

Personal
Money Order

The Chase Manhattan Bank
National Association
New York, New York 10015



CHASE

89164125

13

December 21 1979

Pay to the
order of

Citizens for LA ROUCHE

ONE HUNDRED DOLLARS

Not valid over \$1000.

Purchaser's
Signature

Ann-Marie Roe

Purchaser's
Address

25 Ripley Pl. Buffalo N.Y.

P.M.O. 5 Rev. 5-78

⑈89164125⑈ ⑈001000021⑈ 900⑈5⑈001617⑈

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The Committee to Elect Lyndon LaRouche)
The National Caucus of Labor Committees,)
Campaigner Publications, New Solidarity)
International Press Service, and the)
U.S. Labor Party)

MUR 398, et al.

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on May 5, 1981, the Commission decided in a vote of 5-1 to merge MURs 398, 281, 328, and 368 into MUR 1352.

Commissioners Aikens, Harris, McGarry, Thomson, and Tiernan voted affirmatively. Commissioner Reiche dissented.

Attest:

5-6-81

Date

Lena L. Stafford

Recording Secretary

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
JUN 8 11:28

In the Matter of

The Committee to Elect Lyndon Larouche,
The National Caucus of Labor Committees,
Campaigner Publications, New Solidarity
International Press Service, and the
U. S. Labor Party

MUR 398, 281

328 and 368

GENERAL COUNSEL'S REPORT

BACKGROUND

On October 14, 1976, Lyndon LaRouche, the presidential candidate of the United States Labor Party, submitted a request for presidential primary matching funds with the Federal Election Commission pursuant to 26 U.S.C. § 9033. Due to questions which arose in determining whether Mr. LaRouche had met the threshold requirements, the Commission requested further information from Mr. LaRouche.

On October 28, 1976, Mr. LaRouche and his principal campaign committee, the Committee to Elect Lyndon LaRouche, (hereinafter referred to as CTCL) filed suit in District court for an Order directing the Federal Election Commission (hereinafter referred to as "FEC" or "the Commission") to immediately certify Mr. LaRouche's eligibility to the United States Treasury. In January 1977, the court denied the requested relief and dismissed the action without prejudice. Committee to Elect Lyndon LaRouche, et al., v. Federal Election Commission, U.S.D.C. D.C., Civil Action No. 76-2010.

Even at the time of dismissal of the initial action, the Commission had not received copies of instruments or other written verification of contributions to meet the threshold requirements of the statute. (26 U.S.C. § 9033). In expectation that such written documentation would be received, the Commission had approved on November 4, 1976, pursuant to the provisions of 2 U.S.C. § 438 (a)(8), a matching fund threshold audit of CTCL.

The initial audit work revealed that it was necessary to expand the audit to include examination of the records of organizations associated with CTCL. CTCL occupied space and had common personnel with four other organizations: Campaigner Publications, Inc.; New Solidarity International Press Service (hereinafter, New Solidarity); the National Caucus of Labor Committees (hereinafter NCLC); and the United States Labor Party (hereinafter USLP). These four organizations also accounted for the majority of CTCL's expenditures and debts.

NCLC, a non-reporting entity, appeared to be the umbrella organization for the other four groups. It was founded in 1967 by Mr. LaRouche, who became its Chairman. Shortly after, Mr. LaRouche formed the electoral arm of the organization, USLP. This group, registered with the Commission as a political committee in October, 1975, and has been filing campaign reports since that time. According to a letter received from its counsel in October, 1976, USLP set up a large number of state groups, some of which

have also filed reports with the Commission. The USLP unanimously nominated Mr. LaRouche as its presidential candidate on October 16, 1976, after Mr. LaRouche received the support of the USLP Caucus in each of 30 states.

CTEL, also a reporting entity, is the principal campaign committee of the LaRouche Presidential Campaign.

NCLC members incorporated New Solidarity and Campaigner Publications in New York in 1974. The former corporation is apparently the "intelligence" arm of NCLC. The latter corporation publishes The Campaigner magazine, a monthly publication, and New Solidarity, a biweekly paper which is published in six languages.

On December 29, 1976, the Commission approved an expansion of the CTCL audit to include the related organizations.

On January 14, 1977, the Commission also approved the direct contacting of reported CTCL contributors to verify their contributions in three states: Delaware, Massachusetts, and Wisconsin. The contacts indicated that a substantial number of contributions could not be verified because the contributor could not be located, refused to be interviewed, or denied making all or part of the donation. In one case, a contributor indicated that the contribution had not been made from his own funds. ^{1/}

^{1/} This individual testified in August, 1977, that a USLP representative gave him \$250 to contribute to CTCL in October, 1976, in violation of 2 U.S.C. § 441f. The Commission did not name or proceed against this individual because he was fearful of USLP's reaction to his testimony.

On the basis of the audit and field investigations conducted by the Commission pursuant to 26 U.S.C. § 9038, the Commission determined on February 10, 1977, that CTCL had not reached the matching fund threshold in verifiable contributions. No further audit work on the records of CTCL and the other organizations was performed pursuant to 26 U.S.C. § 9038, counsel having advised the FEC that CTCL would not make the records available and that the other organizations had indicated they would not consent at that time.

On February 14, 1977, Lyndon LaRouche, CTCL and LeRoy Jones (a contributor), filed a petition for review of the Commission's denial of matching funds certification in the Court of Appeals; Committee to Elect Lyndon LaRouche, et al., v. Federal Election Commission, U.S.C.A., D.C. Cir., No. 77-1184, pursuant to 26 U.S.C. § 9041 which enables that court to review any agency action made under the provisions of Chapter 26. That suit is presently pending.

On April 28, 1977, the same plaintiffs filed a damage suit for redress of alleged unconstitutional harassment and actions by agents of the Federal Election Commission in connection with the verification of the matching fund submission. In October 1977, the court found that the FEC investigation was reasonable and within the statutory authority conferred by 2 U.S.C. § 437d and § 438; and there was nothing to support any alleged violation of Plaintiff's common law, statutory or constitutional rights. Jones v. Unknown

Agents of the Federal Election Commission, U.S.D.C., D.C., Civil Action No. 77-0732. This suit is presently pending in the Court of Appeals.

On the basis of information ascertained in the normal course of carrying out the Commission's supervisory responsibilities as well as information received during the audit and field investigations, the Commission found reason to believe that CTEL, USLP, NCLC, Campaigner Publications, and New Solidarity violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act"). The specific violations are as follows:

1. In MUR 281(77), the Commission, on October 28, 1976, found reason to believe that CTEL had violated 2 U.S.C. § 434(b) because of its failure to disclose in its reports the names and addresses and the occupation and principal place of business of contributors. Subsequently, a list of names and addresses was furnished, as part of the request for presidential primary matching funds by Mr. LaRouche. However, a staff review of the request raised a number of factual issues as to the veracity of the information set forth therein.

2. In MUR 328(77), the Commission found on February 3, 1977, reason to believe that CTEL had committed an additional violation of § 434 because of its failure to indicate the source of a \$90,000 expenditure for an election eve broadcast by Mr. LaRouche. Although the expenditure was subsequently reported by the U.S. Labor Party, the accuracy of the reports is still questionable.

3. In MUR 368(77), the Commission, on February 10, 1977, found reason to believe that CTCL had violated 2 U.S.C. § 441(f) and 26 U.S.C. § 9042(d). This finding was based on the fact that during the verification process of CTCL contributors for matching funds, FEC investigators were unable to verify contributors of over \$100 due to the fact that the names or addresses of contributors were incorrect; the contributors did not contribute the amount that CTCL had reported in the matching fund request; the contributor donated money which was given to them by another; or the reported individual did not contribute to CTCL at all.

4. In MUR 398(77), the Commission, on May 11, 1977, found reason to believe that:

a. NCLC violated 2 U.S.C. § 434 by failing to register and report with the Commission. (CTCL reported the receipt of over \$6000 in in-kind contributions from NCLC, with no further explanation.)

b. NCLC violated 2 U.S.C. § 441a by making excessive contributions in-kind to CTCL and USLP. NCLC's in-kind contributions to CTCL exceed \$1,000 in violation of the limit set by 2 U.S.C. § 441a(1)(A); and the steady accumulation of USLP debt to NCLC for rent payments of over \$90,000 suggests that it may be an in-kind contribution to NCLC, which exceeds \$1,000, also a violation of the limits set by 2 U.S.C. § 441a(1)(A).

c. NCLC, CTCL, and USLP violated 2 U.S.C. § 433(b)(2) by not reporting their affiliation with each other even though the organizations share office space at 231 West 29th Street, New York, New York, and appear to have many common officers

and substantial personnel overlaps. (See Attachment I.)

Respondents themselves have referred to USLP and NCLC as interchangeable entities. In a memorandum of law submitted to the U.S. District Court for the Eastern District of Michigan, it is stated:

"Each plaintiff [e.g., in the law suit] is a member of a socialist political organization referred to herein as the United States Labor Party ('USLP') and also known as the National Caucus of Labor Committees ('NCLC')."

d. Campaigner Publications and New Solidarity violated 2 U.S.C. § 441b by making illegal corporate contributions in-kind to USLP, CTCL and NCLC on behalf of the LaRouche Presidential campaign. In 1976, the accumulation of CTCL debt to Campaigner Publications of over \$35,000; the accumulation of USLP debt to New Solidarity of over \$8,000; and the accumulation of CTCL debt to New Solidarity of over \$20,000; and the apparent lack of an attempt to discharge these debts by the organizations, indicates that the debts may be corporate contributions.

e. CTCL violated 26 U.S.C. § 9042(c)(1) by making false and misleading statements in reports for certifications and on audit reports.

All of the above respondents were notified of the Commission's various determinations and asked to submit responses and include certain financial documents. On June 28, 1977, after the respondents failed to respond to follow-up letters, the Commission

issued subpoenas to produce documents and compel testimony from officers of the various respondents. On July 11, 1977, counsel for the Commission and the respondents stipulated to an extension of time until July 20, 1977. On July 20, 1977, the Commission received formal notification of the respondents' breach of the stipulation.

The Commission filed an Order to Show Cause on August 26, 1977. Federal Election Commission v. Committee to Elect Lyndon LaRouche, et al., U.S.D.C., D.C., Misc. No. 77-0190. On September 26, 1977, the court denied the respondents' motion to dismiss except for USLP; and ordered the other respondents (CTEL, NCLC, New Solidarity and Campaigner Publications, Inc.) to comply with the subpoenas served by the FEC. This suit is presently pending in the Court of Appeals.

FEC auditors began reviewing the respondents' records at their offices in New York on November 9, 1977, and depositions of several individuals were scheduled for February 16, 1978. A review of the records revealed that the respondents, in many cases, did not keep complete records. Numerous checks, deposit slips, invoices, bank and financial statements, loan agreements, lease agreements and statements of explanation were missing or non-existent. It did not appear that the respondents were withholding information, but rather that the campaign did not consistently adhere to standard accounting procedures. During the depositions of the individuals connected with the subject organizations, each individual declined to answer any questions on advice of counsel.

Due to the incomplete information which was available, it was determined that the best way to develop evidence was to contact thirteen CTEL contributors who submitted consecutively numbered checks to be matched for primary matching funds.

In July, 1978, an attempt to locate the individual contributors was begun. Cross-directories, post offices, tax assessors, and the local Board of Elections were contacted. None of the individuals could be located. In some cases, the reported addresses did not exist, or there was no record of the individual ever living at the given address.

In September, 1978, the three cases associated with these MURs were argued in the Court of Appeals. This matter has virtually been at a standstill since then in expectancy of a ruling by the court. Since so much time has elapsed since this matter was initiated, this office recommends that the Commission proceed without the Court's decision.

Based on the information presently available to the Commission, and the fact that efforts to further develop this information has failed, we recommend that:

1. No further action should be taken against CTEL in connection with the alleged violations of 2 U.S.C. § 434. Voluntary compliance was achieved when CTEL eventually provided the Commission with information on its contributors (MUR 281(77)) and details of the \$90,000 media expenditure (MUR 328(77)). Although the veracity of the information which was provided was questioned, we have not been able to develop substantial evidence that the information is incorrect. Close the file in MUR 328(77) and MUR 281(77).

2. No further action should be taken against Campaigner Publications and New Solidarity in connection with the alleged violations of 2 U.S.C. § 441b (MUR 398-d). A review of the loans made by Campaigner Publications and New Solidarity to USLP and CTEL revealed there was insufficient evidence to support the allegation of an illegal extension of credit or an extension of credit outside the ordinary course of business. CTEL's debts to Campaigner Publications and New Solidarity are reported to have been reduced by approximately \$23,000 in the past year; and USLP's debts to Campaigner Publications and New Solidarity are reported to have been reduced by approximately \$8,000 in the past year.

3. Find reasonable cause to believe that NCLC, CTEL, and USLP failed to report their affiliation after May, 1977, in accordance with 2 U.S.C. § 433(b)(2) (MUR 398-c). The Commission did not distinguish the difference between an affiliated or connected organization until July, 1976, and the regulations which define affiliated and connected organizations did not become legally effective until May, 1977. However, since May, 1977, NCLC, CTEL and USLP have shared common office space and have overlapping officers and are therefore required to report their affiliation with each other by 2 U.S.C. § 433(b)(2).

4. Find reasonable cause to believe that NCLC violated 2 U.S.C. § 434 for failure to register and report receipts and expenditures with the Commission (MUR 398-a); and reasonable cause to believe that NCLC violated 2 U.S.C. § 441a by making excessive contributions in-kind to CTEL (MUR 398-b). CTEL reported receipts of in-kind contributions from NCLC in excess of \$1,000 in 1976.

5. The Commission should take no further action against CTCL in connection with a violation of 26 U.S.C. § 9042 by providing false and misleading statements in reports for certification of matching funds; and take no further action against CTCL in connection with a violation of 2 U.S.C. § 441f for knowingly accepting a contribution made by one person in the name of another (MUR 368 and 398-e). Commission efforts to verify CTCL contributions and contributors' names and addresses did develop evidence of inconsistencies in CTCL's reports. However, despite extensive investigation into these violations of contributors and individuals associated with CTCL, the sworn testimony of only one individual has been obtained (this individual was reluctant to testify and pleaded that his name not be disclosed because of a fear of personal harm). This dearth of evidence forces the conclusion that these violations cannot be proved in a criminal action.

This matter could be referred to the Justice Department for its consideration of the alleged criminal violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042. However, this Office does not recommend such a course of action. It is questionable whether the Justice Department could develop further evidence in the time remaining under the three year statute of limitations. The statute will have run in October, 1979.

RECOMMENDATIONS

1. Take no further action against CTCL in connection with the alleged violations of 2 U.S.C. § 434 in MUR 281(77) and MUR 328(77). Close the files.

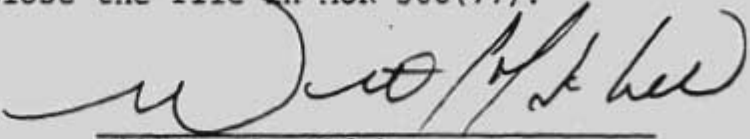
2. Take no further action against Campaigner Publications and New Solidarity in connection with the alleged violations of 2 U.S.C. § 441b in MUR 398-d.

3. Find reasonable cause to believe that NCLC, CTCL, and USLP violated 2 U.S.C. § 433(b)(2) for failure to report their affiliation with each other as alleged in MUR 398-c.

4. Find reasonable cause to believe that NCLC violated 2 U.S.C. § 434 for failure to register and report with the Commission as alleged in MUR 398-a; and reasonable cause to believe that NCLC violated 2 U.S.C. § 441a by making excessive in-kind contributions to CTCL and USLP as alleged in MUR 398-b.

5. Take no further action against CTCL in connection with violations of 26 U.S.C. § 9042 and 2 U.S.C. § 441f as alleged in MUR 368(77) and 398-e. Close the file in MUR 368(77).

Date: 6/6/75


William C. Oldaker
General Counsel

Attachments

1. Officers and Agents of NCLC, USLP and CTCL
2. :
3. :
4. :

OFFICERS AND AGENTS
OF NCLC, CTEL, AND USLP

NAME	NCLC	CTEL	USLP
Acios, Costas	Chief Security	Handles Political Issues	
Engdahl, Bill		Officer	Consultant
Evans, Wayne		1976 V-P Candidate	1976 V-P Candidate
Foster, Ralph		Field Coordinator	Delegate
Inch, Eugene		Consultant	Delegate
LaRouche, Lyndon	National Chairman	1976 Presidential Candidate	Chairman
Lawden, Jeanne		Bookkeeper	Delegate
Moriority, Matthew		Field Coordinator	Delegate
Nasmith, Henry R.		Data Processing	Delegate
Pepper, Stephen		Financial Consultant	Member of Convention Committee
Walsh, Richard E.		Treasurer	Treasurer
White, Carol	Director of Operations	Fundraiser	



FEDERAL ELECTION COMMISSION

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

July 5, 1978

E. D. Spencer
Postmaster
Salem, Ore. 97301

Re: MUR 398

Dear Mr. Spencer:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Ned Norris

3435 Norril La., Salem

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

*No Such Street AS Norril Ln
WE DO have A NORRIS LN*

William C. Oldaker
General Counsel

[Signature]
Charles N. Steele
Assoc. General Counsel

NO FORWARD ON FILE
FROM NORRIS LN.

U. S. POST OFFICE

SALEM, ORE 97301

OFFICIAL BUSINESS

P-86

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



Federal Election Commission
1325 K St N.W.
Washington, DC 20463

8 8 3 0 4 0 3 7 0 5 8 2

UNITED STATES POST OFFICE

CHARLOTTE, N. C. 28228

OFFICIAL BUSINESS

P-192



PERMIT NO. 100
USE TO AVOID PAYMENT
OF POSTAGE. \$300



170 JUL 20 AM 9:40

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20263

UNITED STATES POSTAL SERVICE

CHARLOTTE, NORTH CAROLINA 28226

July 17, 1978

CCM 4202
WAZ

FEDERAL ELECTION COMMISSION

MUR 318

178 JUL 20 AM 9:40

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir:

This is in response to your inquiry of July 5, 1978, to the Postmaster, Charlotte, North Carolina concerning the current address for Barbara Roberts, whose last known address according to your records was 814 Hawthorne #5, Charlotte, N.C. 28204 and Ruby Nesmith, whose last known address you have as 5838 Rose Valley Drive, Charlotte, N.C. 28210.

According to our records, Ruby Nesmith is unknown at the address you have provided and we have no instructions on file concerning delivery of her mail to another address.

Barbara Roberts moved from the address you have provided and gave no instructions for forwarding her mail to another address.

I regret that we are unable to assist you in this matter.

Sincerely,


O. B. Sloan

Sectional Center Manager/Postmaster

OBS:hh



FEDERAL ELECTION COMMISSION

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

~~SECRET~~
FEDERAL ELECTION COMMISSION
CC

18 JUL 18 PM 12:34

July 5, 1978

Benjamin Luscher
Postmaster
Portland, Or. 97208

Re: MUR 398

Dear Mr. Luscher:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Robert Turney 603 SE 19th St., Portland

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

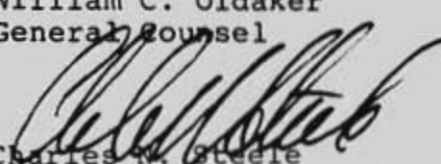
A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

13A 1422 TUR03 2
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

William C. Oldaker
General Counsel


Charles W. Steele
Assoc. General Counsel

UNITED STATES POST OFFICE

POSTAGE DUE ACCOUNTS RM 2130
P.O. BOX 3047
PORTLAND, OR 97208

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE. \$300



'78 JUL 18 PM 12:34

OFFICIAL BUSINESS
P-194

Federal Election Commission

1325 K Street N.W.

Washington, D.C. 20463

*Go.
W. Aldaker*



U.S. POSTAL SERVICE
ROUTING SLIP

DEPT., OFFICE OR
ROOM NO.

- ☐ APPROVAL
☐ SIGNATURE
☐ COMMENT
☐ SEE ME
☐ AS REQUESTED
☐ INFORMATION
☐ READ AND RETURN
☐ READ AND FILE
☐ NECESSARY ACTION
☐ INVESTIGATE
☐ RECOMMENDATION
☐ PREPARE REPLY

TO

1 Jim Heffner

2

3

4

5

FROM

Ken Johnson
Customer Services

7/11/78

EXTENSION

ROOM NO.

Its O.K. to waiver fees on this one.



FEDERAL ELECTION COMMISSION

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

Mr. Sullivan
Station Manager
Post Office
Jamaica Plains, Ma. 02130

July 5, 1978

RE: MUR 398

Dear Mr. Sullivan:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

John D. Howard

9 Asticien Rd.
Jamaica Plains

*moved left
no address 30017*

Yoram Gellam

219 Lamartine,
Jamaica Plains

*moved left
no address 30008*

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U. S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldak
General Counsel
[Signature]
Charles N. Steele
Assoc. General Counsel

JAMAICA PLAINS MA 02130

20 7 1 7 7 7

OFFICIAL BUSINESS
P-438

**PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE. \$300**



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Jack R. Hayes
Postmaster
Petersburg, Indiana 47567

Re: MUR 398

Dear Mr. Hayes:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Elizabeth Moriarty, RR #1, Petersburg

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

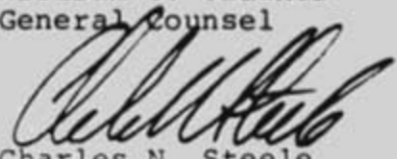
A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

UNKNOWN ON R. R. 1 PETERSBURG, IN. 47567

William C. Oldaker
General Counsel


Charles N. Steele
Assoc. General Counsel

UNITED STATES POST OFFICE

PETERSBURG, VA. 47567

OFFICIAL BUSINESS

EP100

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE \$300



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



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

July 5, 1978

William Minescola
Postmaster
Melrose, Ma. 02176

Re: MUR 398

Dear Mr. Minescola:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Elaine Gibbons

3 Cass St. Melrose

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel

[Signature]
Charles W. Steele
Assoc. General Counsel

7/10/78
Minescola - 14 con
no change of address
in file
W. Blanton
Supv. Mail + Rec.

UNITED STATES POST OFFICE

MELROSE POST OFFICE
23 ESSEX ST.,
MELROSE, MA. 02178

OFFICIAL BUSINESS
EP194



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE 1000



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





FEDERAL ELECTION COMMISSION

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

July 6, 1978

Richard Eaton
Postmaster
Dorchester Center, Mass. 02124

RE: MUR 398

Dear Mr. Luscher:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individual listed below. The addresses we have provided were current as of October, 1976.

Frances O'Connor 25 Maryland St. Dorchester

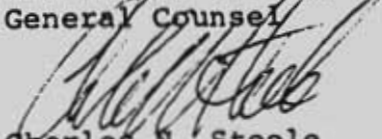
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Mr. Sullivan
Station Manager
Post Office
Jamaica Plains, Ma. 02130

RE: MUR 398

Dear Mr. Sullivan:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

John D. Howard

9 Asticien Rd.
Jamaica Plains

Yoram Gellam

219 Lamartine,
Jamaica Plains

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U. S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldak
General Counsel


Charles N. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Richard Limmer
Manager
Main Post Office
Seattle, Wash. 98109

RE: MUR 398

Dear Mr. Limmer:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Stephen M. Gierman	1058 N. 36 St. Seattle
Theodore Andromidas	4203 SW Hill St. "
Steven Kane	602 12 St. E. "
Ira Liebowitz	1106 E. Thomas "

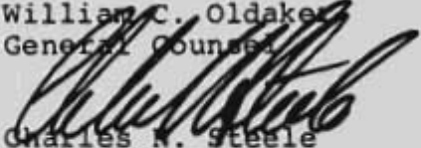
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U. S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles N. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

William Minescola
Postmaster
Melrose, Ma. 02176

Re: MUR 398

Dear Mr. Minescola:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Elaine Gibbons

3 Case St. Melrose

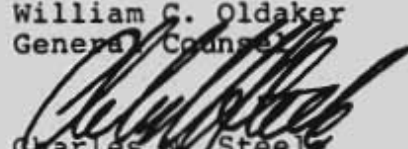
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles W. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Oscar Sloan
Postmaster
Charlotte, NC. 28228

Re: MUR 398

Dear Mr. Sloan:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Barbara Roberts	814 Hawthorne #5, Charlotte
Ruby Nesmith	5838 Rose Valley Dr. "

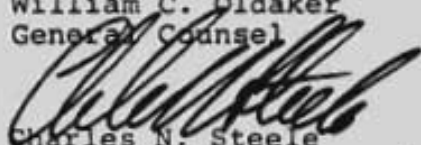
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles N. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Jack R. Hayes
Postmaster
Petersburg, Indiana 47567

Re: MUR 398

Dear Mr. Hayes:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Elizabeth Moriarty, RR #1, Petersburg

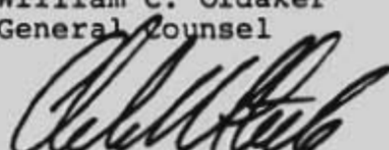
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

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Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel



Charles N. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

E. D. Spencer
Postmaster
Salem, Ore. 97301

Re: MUR 398

Dear Mr. Spencer:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Ned Norris

3435 Norril La., Salem

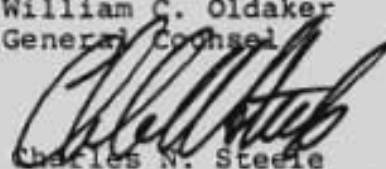
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles N. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Benjamin Luscher
Postmaster
Portland, Or. 97208

Re: MUR 398

Dear Mr. Luscher:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Robert Turney 603 SE 19th St., Portland

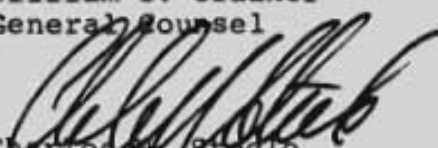
Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel


Charles W. Steele
Assoc. General Counsel



FEDERAL ELECTION COMMISSION

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

February 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gregory J. Perrin, Esquire
225 Broadway
New York, New York 10007

Re: MUR 398(77)

Dear Mr. Perrin:

This confirms the arrangements made during a telephone conversation on January 31, 1978 between you and Lester Scall, an attorney with our office.

We will take the depositions of your clients, Lawrence Hecht, Marcia Merry Pepper and Richard Welsh at the offices of the U.S. Labor Party at 231 West 29th Street, New York City, on Thursday, February 16, 1978, beginning at 10 a.m.

If you have any questions please contact Mr. Scall at (202) 523-4052, or Biz Van Gelder at (202) 523-4175.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



5011 MUR 398

PS Form 3811, Apr. 1977

● **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:**
 Gregory Perrin, Esquire
 225 Broadway
 New York, New York 10007

3. **ARTICLE DESCRIPTION:**
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943063

(Always obtain signature of addressee or agent)

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

4. **DATE OF DELIVERY**
 2/6/78

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS

NEW YORK, N.Y.
 FEB 6 1978
 U.S. MAIL

☆ GPO : 1977-O-234-007

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.

0 5 6 7 3 0 6 6 3

100-2010
FEDERAL ELECTION
77 NOV 9 AM 10:34

JOEL D. JOSEPH

ATTORNEY AT LAW
SUITE 1010
1712 EYE STREET, N.W.
WASHINGTON, D.C. 20006

(202) 338-8560
(202) 338-5492

November 7, 1977

Barbara Van Gelder
Federal Election Commission
Washington, D.C. 20463

Dear Barbara,

This will confirm our two telephone conversations of today. I requested, on behalf of the Committee to Elect Lyndon La Rouche, et. al., a postponement of the return date from November 9, 1977 for a week.

The reason for this request was two-fold. First of all CTCL and the United States Labor Party are actively involved in elections in thirty states which take place tomorrow. Because of the efforts needed for these elections it will be virtually impossible for them to produce all of the subpoenaed materials on Wednesday, November 9, 1977.

Secondly, CTCL et al., have not yet received correspondence from the Commission concerning this new return date. You told me on Thursday of last week by telephone that the Commission sent out letters notifying CTCL, et al. of the new return date.

I further understand that you did not discuss this request with the General Counsel or with Charles Steele, but turned the request down on your own authority.

Sincerely yours,

Joel D. Joseph
Joel D. Joseph

JOEL D. JOSEPH

ATTORNEY AT LAW

SUITE 1010

1712 EYE STREET, N.W.

WASHINGTON, D.C. 20006



Barbara Van Gelder
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463



FEDERAL ELECTION COMMISSION

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

October 31, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Edward Spannaus
President
Campaigner Publications, Inc.
231 West 29th Street
New York, New York

Re: MUR 398 (77) and Federal
Election Commission v. Committee
to Elect Lyndon La Rouche (D.C.D.C.
77-0190

Dear Mr. Spannaus:

On October 18, 1977, the United States District Court denied your Motion for a Stay pending appeal of that Court's Order of September 26, 1977, compelling compliance with the subpoenas issued by the Commission on June 24, 1977.

Please have all subpoenaed documents available for review by the Commission on Wednesday, November 9, 1977 at 10:00 a.m. at 231 West 29th Street, New York, New York.

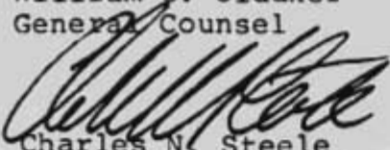
Pursuant to stipulation of counsel entered into on July 8, 1977, the return dates for oral depositions will be rescheduled at a time following review of the documents. The Commission reserves the right to depose all of the subpoenaed individuals and will give each individual five (5) days notice of the re-scheduled date of deposition.

If you have any questions, please contact Biz Van Gelder, (202-523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Joel Joseph
Paul Kamenar


Charles N. Steele
Associate General Counsel





FEDERAL ELECTION COMMISSION

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

October 31, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Marcia Merry Pepper
Chairperson
Committee to Elect Lyndon La Rouché
P.O. Box 1972
G.P.O. New York, New York

Re: MUR 398 (77) and Federal
Election Commission v. Committee
to Elect Lyndon La Rouché (D.C.D.C.,
77-0190)

Dear Ms. Pepper:

On October 18, 1977, the United States District Court denied your Motion for a Stay pending appeal of that Court's Order of September 26, 1977, compelling compliance with the subpoenas issued by the Commission on June 24, 1977.

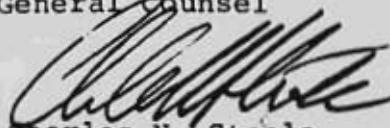
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Pursuant to stipulation of counsel entered into on July 8, 1977, the return dates for oral depositions will be rescheduled at a time following review of the documents. The Commission reserves the right to depose all of the subpoenaed individuals and will give each individual five (5) days notice of the rescheduled date of deposition.

If you have any questions, please contact Biz Van Gelder, (202-523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel

cc: Joel Joseph
Paul Kamenar





FEDERAL ELECTION COMMISSION

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

October 31, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Marjorie Mazel
President
New Solidarity International
Press Service, Inc.
231 West 29th Street
New York, New York

Re: MUR 398 (77) and Federal
Election Commission v. Committee
to Elect Lyndon La Rouche (D.C.D.C.,
77-0190

Dear Ms. Mazel:

On October 18, 1977, the United States District Court denied your Motion for a Stay pending appeal of that Court's Order of September 26, 1977, compelling compliance with the subpoenas issued by the Commission on June 24, 1977.

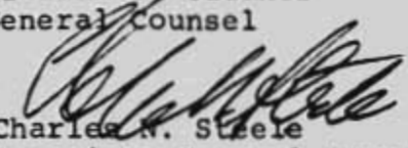
Please have all subpoenaed documents available for review by the Commission on Wednesday, November 9, 1977 at 10:00 a.m. at 231 West 29th Street, New York, New York.

Pursuant to stipulation of counsel entered into on July 8, 1977, the return dates for oral depositions will be rescheduled at a time following review of the documents. The Commission reserves the right to depose all of the subpoenaed individuals and will give each individual five (5) days notice of the re-scheduled date of deposition.

If you have any questions, please contact Biz Van Gelder, (202-523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel

cc: Joel Joseph
Paul Kamenar





FEDERAL ELECTION COMMISSION

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

October 31, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lyndon La Rouché
Chairman
National Caucus of Labor
Committees
231 West 29th Street
New York, New York

Re: MUR 398 (77) and Federal
Election Commission v. Committee
to Elect Lyndon La Rouché (D.C.D.C.,
77-0190

Dear Mr. La Rouché:

On October 18, 1977, the United States District Court denied your Motion for a Stay pending appeal of that Court's Order of September 26, 1977, compelling compliance with the subpoenas issued by the Commission on June 24, 1977.

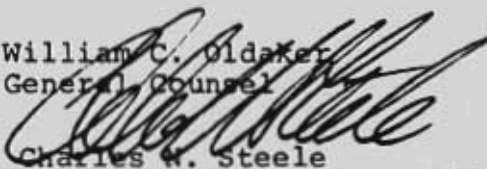
Please have all subpoenaed documents available for review by the Commission on Wednesday, November 9, 1977 at 10:00 a.m. at 231 West 29th Street, New York, New York.

Pursuant to stipulation of counsel entered into on July 8, 1977, the return dates for oral depositions will be rescheduled at a time following review of the documents. The Commission reserves the right to depose all of the subpoenaed individuals and will give each individual five (5) days notice of the rescheduled date of deposition.

If you have any questions, please contact Biz Van Gelder, (202-523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel


Charles W. Steele
Associate General Counsel

cc: Joel Joseph
Paul Kamenar





FEDERAL ELECTION COMMISSION

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

AUTHORIZATION TO ADMINISTER OATHS

The Commission hereby designates Biz Van Gelder to take depositions in connection with MUR's 398, 368, 328 and 281 which have been authorized by the Commission. The Commission hereby designates Gloria R. Sulton to take depositions in connection with MUR 308 which have been authorized by the Commission. The Commission further authorizes the named individuals to administer oaths for any such depositions.

Thomas E. Harris

THOMAS E. HARRIS
Chairman

William R. Springer

WILLIAM SPRINGER
Commissioner

Joan D. Aikens

JOAN AIKENS
Vice Chairman

Neil Staebler

NEIL STAEBLER
Commissioner

Robert O. Tiernan

ROBERT TIERNAN
Commissioner

Vernon W. Thomson

VERNON W. THOMSON
Commissioner





100-943
772170
Telegram

LLB183 WAE231(1714)(2-057211E200)PD 07/19/77 1714

ICS IPMMTZZ CSP

2125638650 TDMT NEW YORK NY 129 07-19 0514P EST
PMS FEDERAL ELECTION COMMISSION, ATTN BIZ VAN GELDER, DLR
1325 K ST NORTHWEST
WASHINGTON DC 20463

I HAVE BEEN PREPARING TO MEET WITH YOU TOMORROW CONCERNING THE
SUBPOENAS. I WAS ADVISED FOR THE FIRST TIME THIS AFTERNOON ~~THAT~~ THE
SUBPOENAS WILL NOT BE COMPLIED WITH. THE REPRESENTATIVES OF THE FIVE
ENTITIES HAVE ADVISED ME THAT IT IS THEIR POSITION THE SUBPOENAS ARE
NOT ENFORCIBLE IN THAT; THEY ARE BEING USED TO GATHER THE NAMES OF
CONTRIBUTORS AND SUPPORTERS FOR THE PURPOSE OF HARASSMENT; THE FEC
IS BIASED; THE FEC IS ENGAGING IN SELECTIVE ENFORCEMENT OF THE ACT;
THE SUBPOENAS ARE BEING USED TO OBTAIN DISCOVERY OF CIVIL CASES; THE
FEC IS ACTING AS AN AGENT FOR THE JUSTICE DEPARTMENT IN AN
CONTINUING INVESTIGATION; THE ACT IS UNCONSTITUTIONAL. I REGRET ANY



western union

Telegram

(1714)(2-057211E200) 2/2

INCONVENIENCE TO YOU AS A RESULT OF MY CLIENTS POSITION. THANK YOU
FOR YOUR COURTESY

GREGORY J PERRIN

NNNN

8 2 1 1 1 5 7 1 3



western union

Telegram

7/4



FEDERAL ELECTION COMMISSION

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

JUL 17 AM 10:11
July 5, 1978

Richard Limmer
Manager
Main Post Office
Seattle, Wash. 98109

804539

RE: MUR 398

Dear Mr. Limmer:

Pursuant to 39 CFR 265.6(d)(1), we request that you provide us with the present addresses of the individuals listed below. The addresses we have provided were current as of October, 1976.

Stephen M. Gierman	1058 N. 36 St. Seattle	<i>moved over one year ago.</i>
Theodore Andromidas	4203 SW Hill St.	<i>"No longer at address. 7/10/78 address."</i>
Steven Kane	602 12 St. E.	<i>"Unknown by carrier 7-13-78"</i>
Ira Liebowitz	1106 E. Thomas	<i>"Unknown by carrier 7-13-78"</i>

Under 39 CFR 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U. S. Government, requires the information requested above in the performance of its official duties, and that all other sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please contact Stuart M. Bondell, the staff member assigned to this matter, at 202-523-4000. (The FTS number is identical).

Thank you very much for your assistance.

Sincerely,

William C. Oldaker
General Counsel

[Signature]
Charles N. Steele
Assoc. General Counsel

3 3 4 9 3 7 9 3 1 3

Before the Federal Election Commission

In the Matter of:

The Committee to Elect Lyndon LaRouche)
United States Labor Party) MUR 398
National Caucus of Labor Committees)
New Solidarity International Press Service, Inc.)
Campaigner Publications, Inc.)

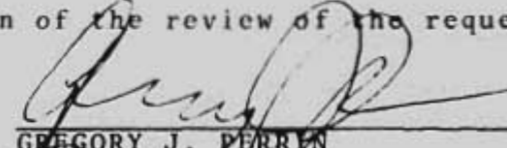
STIPULATION

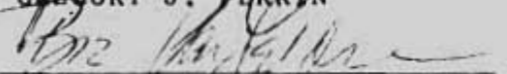
As a result of the representations of counsel for the above-named parties, Gregory J. Perrin, Esq. hereby agrees and stipulates to the following:

1. Counsel will direct the accumulation of documents subpoenaed by the Federal Election Commission June 26th and 27th and will have them available for review by the Commission on Wednesday July 20, 1977 at 10 a.m. at 231 West 29th Street, New York, New York and continuing until complete.
2. Counsel further represents that he believes that substantially all of the documents requested by the Federal Election Commission can be reviewed by the Federal Election Commission without further delay.
3. Counsel further represents that any challenges to any subpoena or document requested will be specific and not based on any need for delay in reviewing or accumulating materials.
4. Counsel further represents that he Gregory J. Perrin is the sole counsel for the above-mentioned parties in respect to MUR 398.

5. The depositions which were scheduled on Thursday, July 14, 1977 and Friday July 15, 1977 will be rescheduled at a time following the completion of the review of the requested documents.

JULY 8, 1977


GREGORY J. PERRIN


BIZ VAN GELDER

POST OFFICE

RECEIVED
FEDERAL ELECTION
COMMISSION

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE \$300



'78 JUL 17 AM 10:11

OFFICIAL BUSINESS

P-194

Federal Election Commission
1325 K Street N.W.
Washington D. C. 20463



MAILGRAM SERVICE CENTER
MIDDLETOWN, VA, 22645

western union

Mailgram



2-036554E188002 07/07/77 ICS IPMMTZZ CSP WSHB
1 2025234115 MGM TDMT WASHINGTON DC 07-07 0133P EST

RECEIVED
FEDERAL ELECTION
COMMISSION
JUL 8 AM 10:14

ACC 844

FEDERAL ELECTION COMMISSION B VANGELDER
1325 K ST NORTHWEST
WASHINGTON DC 20463

772049

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2025234115 TDMT WASHINGTON DC 01 07-07 0133P EST

PMS PAUL KAMENAR, DLR

1712 J ST NORTHWEST SUITE 1010

WASHINGTON DC 20006

ON JULY 7 THE COMMISSION HAS DENIED YOUR REQUEST FOR AN EXTENSION OF
TIME AND WHICH TO COMPLY WITH SUBPOENAS ISSUED IN CONNECTION WITH
MUR398. WE ARE AMENABLE TO CHANGING THE RETURN DATE OF THE SUBPOENAS
FROM JULY 8 1977 UNTIL JULY 11 1977. PLEASE ADVISE WHAT YOUR CLIENTS
NEW SOLIDARITY INTERNATIONAL PRESS SERVICE AND CAMPAIGN OF
PUBLICATIONS DECIDE TO DO

CHARLES N STEELE ACTING GENERAL CONSEL

13135 EST

MGMCOMP MGM

18

RECEIVED
ELECTION



Mailgram



WESTERN UNION
MAILGRAM

THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY

3

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645

western union

Mailgram



2-036893E188002 07/07/77 ICS IPMMTZZ CSP WSHB
1 2025234115 MGM TDMT WASHINGTON DC 07-07 0137P EST

FEDERAL ELECTION COMMISSION B VANGELDER
1325 K ST NORTHWEST
WASHINGTON DC 20463

77 JUL 8 AM 10:14
ACC #4843
772050

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2025234115 TDMT WASHINGTON DC 59 07-07 0137P EST

PHS JOEL D JOSEPH, DLR

1712 I ST NORTHWEST SUITE 1010

WASHINGTON DC 20006

ON JULY 7, 1977 THE COMMISSION DENIED THE REQUEST OF YOUR CLIENTS
CTEL, USLP AND NCLC FOR AN EXTENSION OF TIME IN WHICH TO COMPLY WITH
THE SUBPOENAS ISSUED IN CONNECTION WITH MUR398. WE ARE AMENABLE TO
CHANGING THE RETURN DATE OF THE SUBPOENAS FROM JULY 8 1977 UNTIL
JULY 11 1977. PLEASE ADVISE US OF YOUR CLIENTS DECISION.

CHARLES N STEELE ACTING GENERAL CONSEL

13:37 EST

MGMCOMP MGM

162
FEDERAL ELECTION



Mailgram



371
THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY

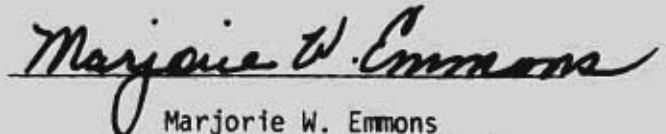
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United States Labor Party, et al)

MUR 398 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission,
do hereby certify that on July 7, 1977, the Commission determined by a
vote of 6-0 to deny the request for a modification of the subpoenas
issued in connection with the above-captioned matter.



Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

July 6, 1977

MEMORANDUM TO; The Commission
FROM: Charles N. Steele *CNS*
SUBJECT: Request for Extension of Time to
Comply with Subpoenas in MUR 398(77)

Attached is a request for modification of the subpoenas sent to members of the United States Labor Party, the Committee to Elect Lyndon LaRouche, the National Caucus of Labor Committees, New Solidarity International Press Service, and Campaigner Publications. See attached letter from Paul Kamenar.

Mr. Kamenar cites the reasons for the extension of time as twofold--(1) that individuals have not had an opportunity to retain local counsel and (2) the documents requested have not been assembled. Both of these reasons lack merit. The subpoenaed people have had reasonable opportunity to obtain counsel in New York, and the documents requested in the subpoenas duces tecum were originally requested on May 13, 1977. In sum, the subpoenas were issued only after respondents had already been afforded reasonable time to comply with the request. Therefore, it does not seem necessary to grant them an extension or modification of the subpoenas.

Pursuant to Commission Regulation 111.13, upon agreement of four Commissioners, the Commission may deny the modification of the subpoenas. When four members have denied the modification, the attached letter will be sent.



Thomas E. Harris
Chairman

William L. Springer
Commissioner

Joan D. Aikens
Vice Chairman

Neil Staebler
Commissioner

Robert O. Tiernan
Commissioner

Vernon W. Thomson
Commissioner

100.809

JUL 5 PM 1:07

LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

(202) 338-5560

July 1, 1977

The Honorable Thomas E. Harris
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

The Commission has sent twelve subpoenas signed by you by certified mail to the U.S. Labor Party, the Committee to Elect LaRouche, and other persons associated therewith. Those subpoenas were received in New York on June 27 and June 28; the return dates of the subpoenas are July 8 and July 15.

On behalf of those persons, I tried unsuccessfully to contact the Commission's General Counsel several times on June 30 and July 1 for the purposes of determining the possibility of obtaining a temporary adjournment. Apparently because of the press of other business, the General Counsel was unable to return my calls. However, on late Friday, July 1, his assistant, Charles Steele, did call and we discussed the matter of an adjournment inasmuch as none of the named persons in the subpoenas have obtained counsel with respect to those subpoenas and that additional time was needed to review the documents and materials requested, and to prepare and assemble them for production.

Mr. Steele stated that he could not grant such an extension of the return dates and that the decision must be made at the Commission level pursuant to a request in writing by me. He did indicate that the three week extension suggested by me would probably be denied.

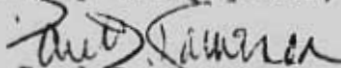
Therefore, on behalf of the named individuals and organizations, I request an adjournment of two weeks so that the return date of July 8 be extended to at least July 22 or at any time thereafter at the convenience of the Commission, and that those returnable by July 15 be extended to July 22, or at any time thereafter at the convenience of the Commission. The reasons for the extension have been stated, namely, that the persons have not obtained counsel in New York as of July 1, that they are actively seeking such counsel, but that it appears that any such counsel will not be retained within a sufficient amount of time by the return dates in order to provide effective assistance of counsel. Furthermore, the subpoenas

Thomas E. Harris(
July 1, 1977
Page Two

request many records, documents, financial statements, deposit tickets and receipts, and other materials which appears will take more time than that provided to review, gather, prepare and assemble such documents. This request should not be construed to waive any rights or privileges of the persons named in the subpoenas. I am acting herein solely in the capacity of requesting the adjournment on behalf of the named parties and in the capacity of receiving a reply from the Commission with respect to the relief requested.

Your prompt consideration of this matter will be greatly appreciated.

Very truly yours,


Paul D. Kamenar

cc: William Oldaker, FEC
General Counsel

1371067062:



FEDERAL ELECTION COMMISSION

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

Paul D. Kamenar, Esq.
1712 Eye Street, N.W.
Suite 1010
Washington, D. C. 20006

Re: MUR 398(77)

Dear Mr. Kamenar:

The Commission has reviewed your request for a modification of the subpoenas sent in connection with MUR 398(77) and has denied it.

If you have any further questions regarding this matter, please contact Biz Van Gelder (telephone no: 202-523-4175) the attorney assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Acting General Counsel



LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

(202) 338-5560

100-809
RECEIVED
FEDERAL ELECTION
COMMISSION

'77 JUL 5 AM 9:29

July 1, 1977

13740370327
Honorable Thomas E. Harris
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

771996

Dear Mr. Chairman:

The Commission has sent twelve subpoenas signed by you by certified mail to the U.S. Labor Party, the Committee to Elect LaRouche, and other persons associated therewith. Those subpoenas were received in New York on June 27 and June 28; the return dates of the subpoenas are July 8 and July 15.

On behalf of those persons, I tried unsuccessfully to contact the Commission's General Counsel several times on June 30 and July 1 for the purposes of determining the possibility of obtaining a temporary adjournment. Apparently because of the press of other business, the General Counsel was unable to return my calls. However, on late Friday, July 1, his assistant, Charles Steele, did call and we discussed the matter of an adjournment inasmuch as none of the named persons in the subpoenas have obtained counsel with respect to those subpoenas and that additional time was needed to review the documents and materials requested, and to prepare and assemble them for production.

Mr. Steele stated that he could not grant such an extension of the return dates and that the decision must be made at the Commission level pursuant to a request in writing by me. He did state that the three week extension suggested by me would probably be denied.


Therefore, on behalf of the named individuals and organizations, I request an adjournment of two weeks so that the return date of July 8 be extended to at least July 22 or at any time thereafter at the convenience of the Commission, and that those returnable by July 15 be extended to July 22, or at any time thereafter at the convenience of the Commission. The reasons for the extension have been stated, namely, that the persons have not obtained counsel in New York as of July 1, that they are actively seeking such counsel, but that it appears that any such counsel will not be retained within a sufficient amount of time by the return dates in order to provide effective assistance of counsel. Furthermore, the subpoenas

Thomas E. Harris
July 1, 1977
Page Two

request many records, documents, financial statements, deposit tickets and receipts, and other materials which appears will take more time than that provided to review, gather, prepare and assemble such documents. This request should not be construed to waive any rights or privileges of the persons named in the subpoenas. I am acting herein solely in the capacity of requesting adjournment on behalf of the named parties and in the capacity of requesting a reply from the Commission with respect to the requested.

Your prompt consideration of this matter will be greatly appreciated.

Very truly yours,


Paul D. Kavanagh

cc: William Oldaker, FEC
General Counsel

33733323

done as ACC 809

LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

(202) 338-5560

RECEIVED
FEDERAL ELECTION
COMMISSION
JUL 5 PM 1:07

July 1, 1977

The Honorable Thomas E. Harris
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

The Commission has sent twelve subpoenas signed by you by certified mail to the U.S. Labor Party, the Committee to Elect LaRouche, and other persons associated therewith. Those subpoenas were received in New York on June 27 and June 28; the return dates of the subpoenas are July 8 and July 15.

On behalf of those persons, I tried unsuccessfully to contact the Commission's General Counsel several times on June 30 and July 1 for the purposes of determining the possibility of obtaining a temporary adjournment. Apparently because of the press of other business, the General Counsel was unable to return my calls. However, on late Friday, July 1, his assistant, Charles Steele, did call and we discussed the matter of an adjournment inasmuch as none of the named persons in the subpoenas have obtained counsel with respect to those subpoenas and that additional time was needed to review the documents and materials requested, and to prepare and assemble them for production.

Mr. Steele stated that he could not grant such an extension of the return dates and that the decision must be made at the Commission level pursuant to a request in writing by me. He did indicate that the three week extension suggested by me would probably be denied.

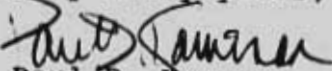
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Thomas E. Harris
July 1, 1977
Page Two

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Your prompt consideration of this matter will be greatly appreciated.

Very truly yours,


Paul D. Ramenar

cc: William Oldaker, FEC
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
U. S. Labor Party, et al)

MURS 398 (77) et al

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 22, 1977, the Commission determined by a vote of 6-0 to deny a stay of all proceedings in all actions concerning the U. S. Labor Party and its affiliates.

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

ACC 719
MUR 398

LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

(202) 338-8560

June 21, 1977

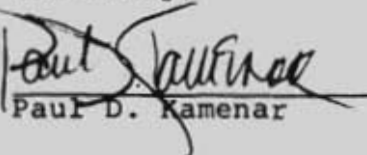
Biz Van Gelder
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Biz:

This letter will confirm the telephone conversation between you and this office in reference to my letter to Commission concerning field investigation of U.S. Labor Party and CTCL contributors.

You have indicated that the Commission will be placing our request on the agenda for Thursday's meeting. You further indicated that until then, there will be no field investigations by the FEC. I presume that you or Mr. Oldaker will inform us as soon as possible after the meeting on Thursday as to the Commission's position.

Sincerely,


Paul D. Kamenar

LAW OFFICES
PAUL D. KAMENAR

1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006



Biz Van Gelder
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

June 23, 1977

Mr. Paul Williams
1717 D Street, S.W.
Suite 1715
Washington D.C. 20006

Dear Mr. Williams:

This letter is to inform you that on June 23, 1977, the Commission determined by a vote of 5-0 to deny your request that the Commission voluntarily accept all investigations concerning compliance matters concerning your clients pending resolution of Jones v. American Friends of the Federal Election Commission (D.C. D.C. 77-17321) and USA v. [redacted] (D.C. C.A. 77-17321).

The Commission is statutorily mandated to conduct compliance matters expeditiously, 2 U.S.C. 2147(a) (18), and will comply with its mandate in this instance. If you have any questions, please contact Bill Van Gilder, telephone no. 202/323-4176, the attorney assigned to this matter.

Sincerely yours,


William C. Gifford
General Counsel

June 23, 1977

Mr. Paul Kamenar
1712 Eye Street, N.W.
Suite 1010
Washington, D.C. 20006

Dear Mr. Kamenar:

This letter is to inform you that on June 22, 1977, the Commission determined by a vote of 6-0 to deny your request that the Commission voluntarily cease all investigations pertaining to compliance matters concerning your clients pending resolution of Jones v. Unknown Agents of the Federal Election Commission (D.C. D.C. 77-0732) and La Rouché v. FEC (D.C. CAA. 77-1184).

The Commission is statutorily mandated to conduct all compliance matters expeditiously, 2 U.S.C. §437g(a)(10), and will comply with its mandate in this instance. If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

LD for BVG
BVanGelder:dks:6/23/77



FEDERAL ELECTION COMMISSION

1275 K STREET, N.W.
WASHINGTON, D.C. 20463

June 23, 1977

Mr. Paul Kamenar
1712 Eye Street, N.W.
Suite 1010
Washington, D.C. 20006

Dear Mr. Kamenar:

3740370335
This letter is to inform you that on June 22, 1977, the Commission determined by a vote of 6-0 to deny your request that the Commission voluntarily cease all investigations pertaining to compliance matters concerning your clients pending resolution of Jones v. Unknown Agents of the Federal Election Commission (D.C. D.C. 77-0732) and La Rouche v. FEC (D.C. C.A. 77-1184).

The Commission is statutorily mandated to conduct all compliance matters expeditiously, 2 U.S.C. 5437g(a) (10), and will comply with its mandate in this instance. If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20004

June 23, 1977

Mr. Joel Joseph
Suite 1010
1712 Eye Street, N.W.
Washington, D.C. 20006

Re: MUR 396(76)

Dear Mr. Joseph:

On June 22, 1977, the Commission denied your request that the Federal Election Commission grant a stay in the proceedings concerning all matters under review in the compliance section of the General Counsel's Office until the District Court action is resolved.

With regard to other matters raised in your letter of June 13, 1977, the Commission stated the basis of its allegations in its letter of notification dated May 13, 1977. Furthermore, with respect to your request for documents which led to the Commission's determination, these documents are part of the Commission's investigatory file and are exempt from disclosure at this time by 2 U.S.C. §552(b)(7).

If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Mr. Joel Joseph
Suite 1020
1712 Eye Street, N.W.
Washington, D.C. 20006

Re: MUR 386(76)

Dear Mr. Joseph:

On June 22, 1977, the Commission denied your request that the Federal Election Commission grant a stay in the proceedings concerning all matters under review in the compliance section of the General Counsel's Office until the District Court action is ~~restored~~.

With regard to other matters raised in your letter of June 13, 1977, the Commission stated the basis of its allegations in its letter of notification dated May 13, 1977. Furthermore, with respect to your request for you documents which led to the Commission's determination, these documents are part of the Commission's investigatory file and are exempt from disclosure at this time by 2 U.S.C. §552(b)(7).

If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

LO for BVG



FEDERAL ELECTION COMMISSION

1455 E STREET, N.W.
WASHINGTON, D.C. 20004

June 23, 1977

Mr. Joel Joseph
Suite 1010
1712 Eye Street, N.W.
Washington, D.C. 20006

Re: MUR 396 (76)

Dear Mr. Joseph:

On June 22, 1977, the Commission denied your request that the Federal Election Commission grant a stay in the proceedings concerning all matters under review in the compliance section of the General Counsel's Office until the District Court action is resolved.

With regard to other matters raised in your letter of June 13, 1977, the Commission stated the basis of its allegations in its letter of notification dated May 13, 1977. Furthermore, with respect to your request for documents which led to the Commission's determination, these documents are part of the Commission's investigatory file and are exempt from disclosure at this time by 2 U.S.C. §552(b)(7).

If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Eldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

June 20, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: William E. Sidaker *W.E. Sidaker*
SUBJECT: Agenda Item - MUR 398

Attached is more backup on MUR 398, et.al. This matter is scheduled to be on the Compliance agenda for Wednesday, June 23, 1977.

Thank you.





FEDERAL ELECTION COMMISSION

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

Memorandum to:

From:

Subject:

Date:

The Commission

William C. Oldaker

Bill
Request for stay of compliance
matters concerning MURS 398 et.al.
June 20, 1977

Attached is a letter from Joel Joseph, received on June 15, 1977, which requests a stay of proceedings concerning all outstanding matters under review which pertain to the U.S. Labor Party and its affiliated organizations.

Pursuant to his request, we are placing this matter on the agenda for June 20, 1977. It is our position that all investigations which were properly initiated should not be suspended upon unfounded allegations of unconstitutional actions by the Commission or its agents.

The verification of matching funds is still an open issue until review of the Commission's denial is completed in the Court of Appeals, LaRouche v. FEC, D.C.C.A. 77-1184. In addition to the matching fund verification, the Commission also has four MURS (MURS 281, 328, 368, 398) which we are statutorily mandated to conduct expeditiously.

There can be no dispute that the Commission commenced these investigations lawfully and in conformity with its statutory license under both Title 2 and Chapter 96 of the FECA.

In view of the above, we recommend that the Commission vote to deny a stay of all proceedings in all actions concerning the U.S. Labor Party and its affiliates.



JOEL D. JOSEPH
ATTORNEY AT LAW
SUITE 1010
1712 EYE STREET, N.W.
WASHINGTON, D.C. 20006

(202) 338-5560
(202) 338-5492

June 13, 1977

William C. Oldaker
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Oldaker,

RE: MUR 398 (77)

This letter is to inform you that I am representing the Committee to Elect Lyndon LaRouche (CTEL), the United States Labor Party (USLP) and the National Caucus of Labor Committees (NCLC) in MUR 398 (77). Before I make a detailed response to your charges I need a clarification.

We hereby request that the Federal Election Commission grant a stay in the proceedings concerning all MURs and compliance actions pending against CTEL, USLP and NCLC until Jones v. Unknown Agents of the Federal Election Commission, U.S. District Court for the District of Columbia Civil Action No. 77-0732 is decided. Please put this item on the Commission's agenda within one week and advise me of its progress. If a satisfactory response to this request is not made within ten (10) days I may seek a protective order from the District Court here.

You claim that CTEL made false and misleading statements. We request that this charge be explained in detail and made more specific. What statements are you referring to? State all reasons that the Commission believes that these statements were either false or misleading.

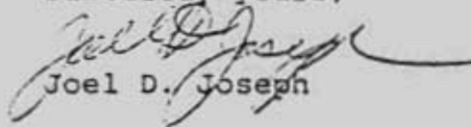
Concerning the Commission's charge that the USLP, CTEL and NCLC are "affiliated", what sections of the regulations or of the statute does the Commission believe has been breached? Your regulations, which have recently become effective, but were not in effect when the reports in question were filed, contains different categories of "affiliated" organizations. Which category does the Commission believe that USLP, CTEL and NCLC come within?

We believe that the Commission's requests for additional documents are unduly burdensome and oppressive, and are

unnecessary harassment of minor political organizations.

Concerning all elements of MUR 398 (77), please supply me with copies of all documents or other evidence that led the Commission to believe that the campaign laws have been violated. Please list all sources for these documents and the circumstances surrounding their discovery. Please provide me with a copy of all Commission decisions made concerning the investigation of this matter.

Sincerely yours,


Joel D. Joseph

c.c. Chairman Harris
Staff Director Potter

100-37031

June 20, 1977

Mr. Paul Kamenar
1712 Eye Street, N.W.
Suite 1010
Washington, D.C. 20006

Dear Mr. Kamenar:

This letter is in response to your hand-delivered letter of June 17, 1977, in which you request that all field investigations cease until the resolution of Jones et al. v. Unknown Agents of the Federal Election Commission (D.C. D.C. 77-0732) and LaRouche v. FEC (D.C. C.A. 77-1184).

It appears that 72 hours to properly respond to your request is patently unreasonable especially in view of the fact that 48 hours of that time was over a weekend. I can assure you that the Commission will act upon your request within a reasonable time. Only after the full Commission has had an opportunity to discuss the matter, will we be in a position to comply with or deny your request.

Sincerely,

William C. Oldaker
General Counsel

BVanGelder:ln:6/20/77

Van Gelder G C

MUR 398

PS Form 3811, Mar. 1977

● 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..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
 Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

PAUL KAMENAR

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

943378

(Always obtain signature of addressee or agent.)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Pauls. Kamenar

4. DATE OF DELIVERY

Jan 20 1977

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLAIMS
INITIALS

☆ GPO : 1977-O-555-455

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RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.



FEDERAL ELECTION COMMISSION

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

JUNE 20, 1977

TO: THE COMMISSION
FROM: THE OFFICE OF THE COMMISSION SECRETARY *mwe*
RE: UNITED STATES LABOR PARTY, et al

Chairman Harris has requested that we circulate the attached
letter from counsel to the United States Labor Party.

This will be discussed in the Compliance Meeting of June 22, 1977
in connection with MUR 398 (76).



LAW OFFICES
PAUL D. KAMENAR

1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

(202) 338-8560

June 17, 1977

The Honorable Thomas E. Harris
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

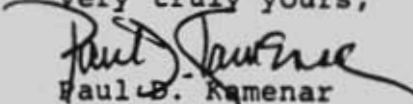
It has come to my attention that at least two Federal Election Commission investigators have been conducting visits earlier this week at the homes and workplaces of several contributors to the United States Labor Party and the Committee to Elect Lyndon LaRouche in the Indianapolis, Indiana area. Ostensibly, the surprise visits are for the purpose of verifying contributions for matching funds.

On behalf of the United States Labor Party and the parties involved, I must insist that you immediately cease all such field investigations until the resolution of the two legal actions that are now pending here in the United States courts. As you may know, those cases allege that the matching verification process and conduct of FEC investigators are serious violations of statutory procedures and important constitutional rights.

If you do not intend to comply with this request, please notify me at once so that other legal remedies may be pursued to safeguard the rights of the parties involved. If I do not hear with you within 72 hours from the time of the delivery of this letter to your office, I will assume that you and the Commission will not honor this request.

Thanking you for your prompt consideration of this matter, I remain,

Very truly yours,


Paul D. Kamenar

cc: Attorney General
Barbara Allan Babcock, Dept. of Justice
Robert Franzinger, Dept. of Justice
✓ William Oldaker, Federal Election Commission

LAW OFFICES
PAUL D. KAMENAR
C1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

17 JUN 17 P4:51

William Oldaker
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

HAND-DELIVERED

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: Committee to Elect Lyndon LaRouche
P. O. Box 1972
G.P.O. New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the Committee to Elect Lyndon LaRouche (CTEL) is hereby SUBPOENAED to appear at the offices of CTCL 231 West 29th Street, New York, New York, on July 8, 1977, at 9:00 a.m. and to bring with him or her:

1. Copies of all receipts of CTCL from contributors, fundraising events, or loans from October 16, 1976, to the present.
2. Records of all expenditures made by CTCL from October 18, 1976, to present, with copies of the invoices which reflect the services received for payments made.
3. Copies of all loan agreements with lenders to CTCL. Please include the interest and amount of principal still outstanding.
4. All records and documents dealing with transfers of money by CTCL to the National Caucus of Labor Committees.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Commons
Secretary to the Commission

MUR 398 Kanfelder

SENDER: Complete steps 1, 2, and 3. Add your name to the "RETURN TO" space on reverse.

1. The following service is requested (check one):
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☒ Show to whom, date, & address of delivery..... 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Comm. to Elect Lyndon
La. Rouche
NY, NY

3. ARTICLE DESCRIPTION:
REGISTERED NO. 1943463 | INSURED NO.

4. I have received the article described above.
SIGNATURE ☐ Address ☐ Address of recipient
James E. Harris

5. DATE OF DELIVERY
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6. ADDRESS OF DELIVERY
NEW YORK, NY

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62. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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77. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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78. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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79. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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80. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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81. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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82. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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83. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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84. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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87. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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88. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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89. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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90. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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91. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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92. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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93. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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94. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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95. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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98. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
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99. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
INC.

100. UNLESS YOU WANT TO RETURN TO THE SENDER, SIGNATURE OF ADDRESSEE
INC.

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: National Caucus of Labor Committees
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the National Caucus of Labor Committee (NCLC) is hereby SUBPOENAED to appear at the offices of NCLC, 231 West 29th Street, New York, New York, on July 8, 1977, at 10:00 a.m. and to bring with him or her:

1. All records reflecting an agreement or agreements between NCLC and the United States Labor Party (USLP) in force from 1976 to the present for the provision of office space and services in connection therewith.

2. The agreement or agreements between NCLC and any other party or parties from whom it leases office space.

3. Records of all loan agreements made by NCLC with USLP and the Committee to Election LaRouche (CTEL) involving monies used in connection with a federal election, particularly as reflected in the campaign reports of the latter two groups.

4. Records of all debts owed to NCLC by CTEL and amounts paid by CTEL in connection therewith. Records

MUR 398 Van Gelder

PS Form 3811, Rev. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

<p>● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.</p>								
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered..... 13¢</p> <p><input checked="" type="checkbox"/> Show to whom, date, & address of delivery.. 33¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢</p>								
<p>2. ARTICLE ADDRESSED TO: National Caucus of Labor Comm. 231 W. 29th St NY, NY</p>								
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>943456</td> <td></td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		943456	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	943456							
<p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent</p> <p>RW [Signature]</p>								
<p>4. DATE OF DELIVERY 6/28/77</p>		<p>POSTMARK</p>						
<p>5. ADDRESS (Complete only if requested)</p>								
<p>6. UNABLE TO DELIVER BECAUSE:</p>		<p>CLERK'S INITIALS</p>						

of deposits of monies received from CTEL in connection with said debts.

5. Records of all debts owed to NCLC by USLP and amounts paid by USLP in connection therewith. Records of deposits of monies received from NCLC in connection with said debts.

6. Any records which document a number of entries in schedule A of USLP reports listing NCLC as the donor without any description of the services (see attached pages), including any record which describes: (a) the explicit services underlying the entry, or (b) the person(s) involved in these services.

7. Any records which document several entries in CTEL campaign reports bearing the notation "contribution-in-kind" and listing NCLC as the donor (see attached pages), including any record which describes: (a) the explicit services underlying the contribution-in-kind, or (b) the person(s) involved in these services.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Connor
Secretary to the Commission

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 1 of 1 for

LINE NUMBER 15

(Use separate schedule for each numbered line)

Name of Contributor or Committee (in full)

U.S. Labor Party

Full Name, mailing address and ZIP code
**National Caucus of Labor Committees
231 W. 29th Street
New York, N.Y. 10001**

Date (month,
day, year)

09/03/76

Amount of each
receipt this period

\$200.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Full Name, mailing address and ZIP code
Same as above

Date (month,
day, year)

09/17/76

Amount of each
receipt this period

65.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/17/76

Amount of each
receipt this period

115.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/20/76

Amount of each
receipt this period

650.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/16/76

Amount of each
receipt this period

275.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/16/76

Amount of each
receipt this period

125.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate Year to date **> 5**

Amount of receipts for this period

Total for all receipts for this period

76030330621

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

LINE NUMBER 18

(Use separate schedule(s) for each numbered line)

Name of Contributor or Committee in full

U.S. Labor Party

Full Name, mailing address and ZIP code

**National Caucus of Labor Committees
231 W. 29th Street
New York, N.Y. 10001**

Date (month,
day, year)

09/07/76

Amount of each
receipt this period

\$200.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/08/76

Amount of each
receipt this period

250.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

09/24/76

Amount of each
receipt this period

600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

03/31/76

Amount of each
receipt this period

175.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

08/15/76

Amount of each
receipt this period

600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Same as above

Date (month,
day, year)

08/15/76

Amount of each
receipt this period

300.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Subtotal of receipts this page (must equal)

12,275.00

Page (Special Instructions, page number)

**Contributions, Ticket Purchases, Loans,
Rebates and Transfers for line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 2 of 4 for

LINE NUMBER 18b

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

U.S. Labor Party

Full Name, mailing address and ZIP code

**National Caucus of Labor Committees
231 W. 29th Street
New York, N.Y. 10001**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

03/16/76

Amount of each
receipt this period

\$600.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

09/08/76

Amount of each
receipt this period

200.00

Full Name, mailing address and ZIP code

10

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > 5

Date (month,
day, year)

Amount of each
receipt this period

Total of receipts this page (optional)

Total of receipts this page (optional)

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 2 of 3 for

LINE NUMBER: 15

For copies of instructions (1) for each
particular line

Form 3-76
Washington, D.C. 20543

Name of Candidate or Committee (Full)

Committee to Elect LaRouche

Full Name, mailing address and ZIP code

National Caucus of Labor Committees

Principal place of business

231 W. 29 St.

Occupation

Political Action Group

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$ 1,250**

Date (month,
day, year)

**3/1/76 \$1,250
contribution
in kind**

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month,
day, year)

Amount of each
receipt this period

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions and Act.)

Page 1 of 1 for

LINE NUMBER 15

(Use separate schedule for each contributor listed)

Filing Commission
1001, N.W.
Washington, D.C. 20003

Name of Contributor or Contributor's full

Committee to Elect Lakoucho

Full Name, mailing address and ZIP code

**National Caucus of Labor Committees
231 W. 29 St. New York, NY 10001**

Date (month,
day, year)

4/1/76

Amount of cash
received this period

\$2500

Principal place of business

Occupation

political action group

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 3,750**

in-kind

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
received this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 0**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
received this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 0**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
received this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 0**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
received this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 0**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
received this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 0**

Signature of contributor (How do you print name?)

Signature of contributor (How do you print name?)

RECORDS, AND TRANSACTIONS FOR 1976 Numbers 15, 16, 17 and/or 18 of FEC Form 3

(Use duplicate sheets of 3 for each
 contribution listed)

Name of Candidate or Committee in full

Full Name, mailing address, and ZIP code

National Caucus of Labor Committees, 251 W. 29th St. NYC, NY

Date (month,
 day, year)

7/1/76

Amount of cash
 received (in case of)

1,350

(in-kind)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$55,000

Full Name, mailing address and ZIP code

Date (month,
 day, year)

Amount of cash
 received (this period)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$5

Full Name, mailing address and ZIP code

Date (month,
 day, year)

Amount of cash
 received (this period)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$5

Full Name, mailing address and ZIP code

Date (month,
 day, year)

Amount of cash
 received (this period)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$5

Full Name, mailing address and ZIP code

Date (month,
 day, year)

Amount of cash
 received (this period)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$5

Full Name, mailing address and ZIP code

Date (month,
 day, year)

Amount of cash
 received (this period)

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date contributions \$5

Signature of contributor (print name)

5

Total this page (this page number only)

5

Committee to Elect Lyndon B. Johnson

Full Name, mailing address and ZIP code National Council of Labor Committees		Date (month, day, year) 9/1/76	Amount of each receipt (this period) \$1,250.00 (in-kind)
Principal place of business 231 J. 29 St. New York, N.Y. 10001	Occupation Political Action Group <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$1,250		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt (this period)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Subtotal of receipts (this page) (optional)			\$1,250.00
Total (this period) (last page this line number only)			

PS Form 3811, Mar. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 398 Van Gelder

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..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Campaigner Publications, Inc.
231 W. 29th St.
NY, NY

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	9113457	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. *Ruth B. King*
DATE OF DELIVERY
6/29

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: Campaigner Publications, Inc.
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of Campaigner Publications, Inc. (CP) is hereby SUBPOENED to appear at the offices of CP, 231 West 29th Street, New York, New York, on July 8, 1977, at 11:30 a.m. and to bring with him or her:

1. Records of all debts owed to CP by the Committee to Elect Lyndon LaRouche (CTEL) and the United States Labor Party (USLP) in connection with those committees' expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL and USLP; and records of all deposits of such payments.

2. All records containing a description of services rendered by CP on behalf of the 1976 campaign of Mr. LaRouche and, wherever possible, representative samples of said services.

3. Copies of CP financial statements for fiscal years 1975 and 1976.

4. Copies of any cash flow statements of CP for fiscal years 1975 and 1976.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margerie W. Enmons
Secretary to the Commission

13040370651

PS Form 3811, Rev. 1976
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 398 Van Gelder

● 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).		
<input type="checkbox"/> Show to whom and date delivered.....		15¢
<input checked="" type="checkbox"/> Show to whom, date, & address of delivery..		35¢
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered.....		65¢
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery		85¢
2. ARTICLE ADDRESSED TO: New Solidarity Press Service, Inc. 231 W. 29th St. NY, NY		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943458	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
4. DATE OF DELIVERY 27		POSTMARK
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: New Solidarity International Press Service, Inc.
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of New Solidarity International Press Service, Inc. (NSIPS) is hereby SUBPOENAED to appear at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 8, 1977, at 11:00 a.m. and to bring with him or her:

1. Records of all debts owed to NSIPS by the Committee to Elect Lyndon LaRouche (CTEL) and the United States Labor Party (USLP) in connection with those committees' expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL and USLP; and records of all deposits of such payments.

2. All records containing a description of services rendered by NSIPS on behalf of the 1976 presidential campaign of Mr. LaRouche and, whenever possible, representative samples of said services.

3. Copies of NSIPS financial statements for fiscal years 1975 and 1976.

4. Copies of any cash flow statements of NSIPS for fiscal years 1975 and 1976.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

23040370667

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: United States Labor Party
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the United States Labor Party (USLP) is hereby SUBPOENAED to appear at the offices of USLP, 231 West 29th Street, New York, New York, on July 8, 1977, at 9:30 a.m. and to bring with him or her:

1. Any records which document expenditure entries (see attached copies) in USLP reports which bear the notation "Creditor of NCLC" including any record which describes: (a) the explicit purpose for which it was made; or (b) the person(s) making the expenditure.

2. Records of payments by USLP to Niles Realty, as well as records of payments to the National Caucus of Labor Committees (NCLC) for rent and utilities.

3. A copy of the rental agreement between USLP and its lessor.

4. Records of expenditures made by USLP on behalf of the LaRouche Presidential Campaign, including but

MUR 398 Van Gelder

PS Form 3811, Mar. 1975

● 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..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
U.S. Labor Party
231 W. 29th St.
NY NY

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
94/3455

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

not limited to all television shows on which Mr. LaRouche appeared, and all expenditures to Campaigner Publications and New Solidarity International Press Service. This should include copies of invoices between USLP and all vendors which USLP used on behalf of the LaRouche Presidential Campaign.

5. Records of all loan agreements of USLP with commercial establishments and documentation of the security on which these loans were based.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Emswiler
Secretary to the Commission

1990 1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070 2071 2072 2073 2074 2075 2076 2077 2078 2079 2080 2081 2082 2083 2084 2085 2086 2087 2088 2089 2090 2091 2092 2093 2094 2095 2096 2097 2098 2099 2100 2101 2102 2103 2104 2105 2106 2107 2108 2109 2110 2111 2112 2113 2114 2115 2116 2117 2118 2119 2120 2121 2122 2123 2124 2125 2126 2127 2128 2129 2130 2131 2132 2133 2134 2135 2136 2137 2138 2139 2140 2141 2142 2143 2144 2145 2146 2147 2148 2149 2150 2151 2152 2153 2154 2155 2156 2157 2158 2159 2160 2161 2162 2163 2164 2165 2166 2167 2168 2169 2170 2171 2172 2173 2174 2175 2176 2177 2178 2179 2180 2181 2182 2183 2184 2185 2186 2187 2188 2189 2190 2191 2192 2193 2194 2195 2196 2197 2198 2199 2200 2201 2202 2203 2204 2205 2206 2207 2208 2209 2210 2211 2212 2213 2214 2215 2216 2217 2218 2219 2220 2221 2222 2223 2224 2225 2226 2227 2228 2229 2230 2231 2232 2233 2234 2235 2236 2237 2238 2239 2240 2241 2242 2243 2244 2245 2246 2247 2248 2249 2250 2251 2252 2253 2254 2255 2256 2257 2258 2259 2260 2261 2262 2263 2264 2265 2266 2267 2268 2269 2270 2271 2272 2273 2274 2275 2276 2277 2278 2279 2280 2281 2282 2283 2284 2285 2286 2287 2288 2289 2290 2291 2292 2293 2294 2295 2296 2297 2298 2299 2300 2301 2302 2303 2304 2305 2306 2307 2308 2309 2310 2311 2312 2313 2314 2315 2316 2317 2318 2319 2320 2321 2322 2323 2324 2325 2326 2327 2328 2329 2330 2331 2332 2333 2334 2335 2336 2337 2338 2339 2340 2341 2342 2343 2344 2345 2346 2347 2348 2349 2350 2351 2352 2353 2354 2355 2356 2357 2358 2359 2360 2361 2362 2363 2364 2365 2366 2367 2368 2369 2370 2371 2372 2373 2374 2375 2376 2377 2378 2379 2380 2381 2382 2383 2384 2385 2386 2387 2388 2389 2390 2391 2392 2393 2394 2395 2396 2397 2398 2399 2400 2401 2402 2403 2404 2405 2406 2407 2408 2409 2410 2411 2412 2413 2414 2415 2416 2417 2418 2419 2420 2421 2422 2423 2424 2425 2426 2427 2428 2429 2430 2431 2432 2433 2434 2435 2436 2437 2438 2439 2440 2441 2442 2443 2444 2445 2446 2447 2448 2449 2450 2451 2452 2453 2454 2455 2456 2457 2458 2459 2460 2461 2462 2463 2464 2465 2466 2467 2468 2469 2470 2471 2472 2473 2474 2475 2476 2477 2478 2479 2480 2481 2482 2483 2484 2485 2486 2487 2488 2489 2490 2491 2492 2493 2494 2495 2496 2497 2498 2499 2500 2501 2502 2503 2504 2505 2506 2507 2508 2509 2510 2511 2512 2513 2514 2515 2516 2517 2518 2519 2520 2521 2522 2523 2524 2525 2526 2527 2528 2529 2530 2531 2532 2533 2534 2535 2536 2537 2538 2539 2540 2541 2542 2543 2544 2545 2546 2547 2548 2549 2550 2551 2552 2553 2554 2555 2556 2557 2558 2559 2560 2561 2562 2563 2564 2565 2566 2567 2568 2569 2570 2571 2572 2573 2574 2575 2576 2577 2578 2579 2580 2581 2582 2583 2584 2585 2586 2587 2588 2589 2590 2591 2592 2593 2594 2595 2596 2597 2598 2599 2600 2601 2602 2603 2604 2605 2606 2607 2608 2609 2610 2611 2612 2613 2614 2615 2616 2617 2618 2619 2620 2621 2622 2623 2624 2625 2626 2627 2628 2629 2630 2631 2632 2633 2634 2635 2636 2637 2638 2639 2640 2641 2642 2643 2644 2645 2646 2647 2648 2649 2650 2651 2652 2653 2654 2655 2656 2657 2658 2659 2660 2661 2662 2663 2664 2665 2666 2667 2668 2669 2670 2671 2672 2673 2674 2675 2676 2677 2678 2679 2680 2681 2682 2683 2684 2685 2686 2687 2688 2689 2690 2691 2692 2693 2694 2695 2696 2697 2698 2699 2700 2701 2702 2703 2704 2705 2706 2707 2708 2709 2710 2711 2712 2713 2714 2715 2716 2717 2718 2719 2720 2721 2722 2723 2724 2725 2726 2727 2728 2729 2730 2731 2732 2733 2734 2735 2736 2737 2738 2739 2740 2741 2742 2743 2744 2745 2746 2747 2748 2749 2750 2751 2752 2753 2754 2755 2756 2757 2758 2759 2760 2761 2762 2763 2764 2765 2766 2767 2768 2769 2770 2771 2772 2773 2774 2775 2776 2777 2778 2779 2780 2781 2782 2783 2784 2785 2786 2787 2788 2789 2790 2791 2792 2793 2794 2795 2796 2797 2798 2799 2800 2801 2802 2803 2804 2805 2806 2807 2808

Yours truly
11/22/76 - 12/31/76

Dec. 1901 New York, New York Times

WILLIAMS

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* Auto Clinic

To Corbett & Hall
For B. Jones office
sent

1

1577

1997

Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 23, and/or 24 of FEC Form 3

LINE NUMBER 20

(Use this line to calculate for each month and year)

(See Instructions on Page 1)

U.S. Labor Party

11/1/76 - 10/1/77

Full Name, including title and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Scott P. B. 3 414 East 110th St Pittsburgh, Pa.	Organizational Services	5/3/76	350
Robert Strom 21 Woodlawn Avenue Madison, Connecticut 06442	Reimbursement for travel expenses	5/4/76	20
Bill Wiedel 574 Washington Rt. 503 New York, N.Y. 10033	Consulting Services	5/11/76	90
C & P Telephone P.O. Box 2123 Washington, D.C. 20053	Baltimore Office Telephone	5/19/76 6/12/76 6/21/76	150 500 300
Wiles Realty 231 West 29th Street New York, New York 10001	To credit of NYC 231 W. 29th Street for Rent	5/23/76 8/13/76 8/17/76 8/19/76	500 600 600 600
Pine & Riverview 14 Court Street Room 305 Brooklyn, New York 11201	To credit of Union Harrington 231 E. 11th Street New York, N.Y. for organizational exp.	5/27/76 6/17/76	225 225
Charles David Supply Co. 34 West 20th Street New York, New York	Toilet paper	5/28/76	22.43
Charles David Supply Co. 34 West 20th Street New York, New York	Office supplies	5/28/76 7/31/76	43.36 48.36
Total			173.00

Full Name _____ mailing address _____ ZIP code _____

Full Name: Address: ZIP Code:

Full Name in Print: _____ ID: _____ ZIP Code: _____

Full name, maiden name, address and ZIP code

Full Name, Street Address and ZIP code

Amount of $x = 10$ (arbitrary)
 Amount of $y = 10$ (arbitrary)

23.11

24.57

Amount of cash expended
for the 6-yr period

502.

Amount of each expenditure paid

87.

Amount of each expenditure this period

Amount of cash expended during this period

330

Amount of cash received
with this order: \$

450.05

150

150.
209. 27

Amount paid to the
Government

2007

250
150
$$\frac{\partial}{\partial t} \left(\frac{\partial \mathcal{L}}{\partial \dot{q}} \right) = \frac{\partial \mathcal{L}}{\partial q}$$

Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 2

LINE NUMBER 22

(See instructions on back of this form)

(See instructions on back of this form)

Line of Contribution or Disbursement

U.S. Labor Party

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Economy Industrial Supply Corp. 1123 Broadway New York, New York	Office Maintenance Supplies	7/16/76	34.50
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
McBurney WGA 215 West 25th Street New York, New York	Room Rental	7/18/76	55.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Carewinger Publications 231 West 29th Street New York, New York 10001	On Account	7/26/76	70.
	" "	8/06/76	50.
	" "	8/11/76	15.
	" "	8/28/76	35.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Carewinger Publications same as above	" "	10/01/76	50.
	" "	10/03/76	175.
	" "	10/07/76	75.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wiles Realty 231 West 29th Street New York, New York 10001	To Creditor of NCCLC -- for rent	8/25/76	600.
	231 W. 29th St.	9/07/76	600.
	New York, N.Y. 10001	9/03/76	600.
		9/07/76	600.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wiles Realty same as above	Same as above	9/13/76	600.
		9/16/76	600.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Eugene Ilich, M.D. 145 Berkeley Place Brooklyn, N.Y. 11207	Raidraising	8/27/76	600.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mitchell's Graphic Products 1000 1st Ave New Jersey, New Jersey 07302	In-house printing	8/31/76	450.00
Amount of each expenditure this period			1,000.00
Amount of each expenditure this period			1,000.00

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Marcia Merry Pepper
P. O. Box 1972
G.P.O. New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 2:30 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Commons
Secretary to the Commission

MUR 398 Van Gelder

PS Form 3811, Rev. 1978

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on
reverse.

1. The following service is requested (check one).

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 60¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Marcia Merry Pepper
PO Box 1972
GPO NY, NY

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943461

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER. INC. CLIENT'S INITIALS

NEW YORK NY
JUN 28 1978

☆ GPO: 1978-O-595-453

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Laurence Hecht
P. O. Box 1972
G.P.O. New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 9:00 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Conners
Secretary to the Commission

MUR 398 Van Gelder

PS Form 3811, Rev. 1976

● 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..... 13¢
☒ Show to whom, date, & address of delivery.. 33¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Laurence Hecht
PO Box 1972
GPO, NY, NY

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

943462

(Always obtain signature of addressee or agent)

I have received the article described above. ☒ SIGNATURE ☐ ADDRESS ☒ AUTHORIZED AGENT

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1976-O-555-428

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



MUR 398 Van Gelder

PS Form 3811, Rev. 1976

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..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Lyndon LaRouche
Chrmn, Natl. Caucus of Labor Comm
Group, U.S. Labor Party

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943159

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 5-27 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Lyndon LaRouche
Chairman, National Caucus of Labor Committees
Chairman, United States Labor Party
231 West 29th Street
New York, New York

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 with regard to contributions to the Committee to Elect Lyndon LaRouche (CTEL), alleged reporting violations by the National Caucus of Labor Committees (NCLC), alleged excessive contributions by NCLC, and alleged reporting violations by the United States Labor Party (USLP). Notice is hereby given that the deposition is to be taken at the offices of CTCL, 231 West 29th Street, New York, New York, on July 14, 1977, at 4:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Walter E. Brennan
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Edward Spannaus
9 Cabrini Boulevard
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) and Campaigner Publications, Inc. (CP) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 9:00 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Connor
Secretary to the Commission

MUR 398 Van Gelder

PS Form 3811, Nov. 1976

● 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). <input type="checkbox"/> Show to whom and date delivered..... 15¢ <input checked="" type="checkbox"/> Show to whom, date, & address of delivery.. 75¢ <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢ <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢	
2. ARTICLE ADDRESSED TO: Edward Spannaus 9 Cabrini Blvd NY, NY	
3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. 943864	
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent Mary Spannaus	
4. DATE OF DELIVERY 6/28/77	POSTMARK
5. ADDRESS (Complete only if requested) 9 CAB BLVD NYC 1033	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

1 8 6 0 2 3 0 1 0 5 0

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Nancy Spannaus
9 Cabrini Boulevard
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) and Campaigner Publications, Inc. (CP) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 10:30 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Commey
Secretary to the Commission

PS Form 3811, May, 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 398 Van Gelder

<p>● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.</p>					
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered..... 15¢</p> <p><input checked="" type="checkbox"/> Show to whom, date, & address of delivery.. 35¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢</p>					
<p>2. ARTICLE ADDRESSED TO:</p> <p>Nancy Spannaus 9 Cabt. Bld NY, NY</p>					
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO. 14</td> <td>CERTIFIED NO. 945465</td> <td>INSURED NO.</td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p> <p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p> <p><i>[Signature]</i></p>			REGISTERED NO. 14	CERTIFIED NO. 945465	INSURED NO.
REGISTERED NO. 14	CERTIFIED NO. 945465	INSURED NO.			
<p>4. DATE OF DELIVERY</p> <p>6/28/77</p>		<p>POSTMARK</p>			
<p>5. ADDRESS (Complete only if requested)</p> <p>9 CAB BLD NYC 10033</p>					
<p>6. UNABLE TO DELIVER BECAUSE:</p>		<p>CLERK'S INITIALS</p>			

1 6 0 0 7 0 0 8

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Marjorie Mazel
231 West 29th Street
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 1:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marianne W. Commons
Secretary to the Commission

7 0 0 3 5

MUR 398 Van Gelder

PS Form 3811, Rev. 1976

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..... 15¢
☒ Show to whom, date, & address of delivery.. 30¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Marjorie Mazel
231 W. 29th St.
NY, NY

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943460

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
6-21

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Ellen Berg
231 W. 24th Street
Apt. 17B
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 2:30 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Commons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Richard E. Welsh
709 West 176th Street
New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 10:30 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas F. Harris
Thomas F. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marianne W. Connors
Secretary to the Commission

MUR 398 Van Gelder

PS Form 3811, Rev. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

<p>● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.</p>								
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered..... 15¢</p> <p><input checked="" type="checkbox"/> Show to whom, date, & address of delivery.. 35¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢</p> <p><input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢</p>								
<p>2. ARTICLE ADDRESSED TO:</p> <p>Richard E. Welsh 709 W. 176th St. NY, NY</p>								
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>943467</td> <td></td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		943467	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	943467							
<p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p> <p><i>Richard E. Welsh</i></p>								
<p>4. DATE OF DELIVERY</p>		<p>POSTMARK</p>						
<p>5. ADDRESS (Complete only if requested)</p>								
<p>6. UNABLE TO DELIVER BECAUSE:</p>		<p>CLERK'S INITIALS</p>						

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Dr. Stephen Pepper
110 Bennett Avenue
Apt. 4B
New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL), alleged corporate contributions by Campaigner Publications, Inc. to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL), and alleged reporting violations by USLP. Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 1:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marianne W. Commons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

June 17, 1977

MEMORANDUM TO: The Commission
FROM: William C. Oldaker *WCO*
SUBJECT: Murs 281, 328, 368 and 398

Pursuant to our investigation of this MUR, we herewith request that the Commission issue subpoenas duces tecum under 2 U.S.C. §437d(a)(3) compelling production of records by each of the named respondents in this matter: Committee to Elect Lyndon LaRouche; National Caucus of Labor Committees; United States Labor Party; Campaigner Publications; and New Solidarity International Press Service. All of the records sought were requested in the notification letters which accompanied the Commission's reason to believe findings in this matter. Respondents have indicated they will not voluntarily produce the records.

Pursuant to 2 U.S.C. §437d(a)(4), we also request authority to depose a number of individuals who have held or now hold supervisory positions with the groups named in MURS 281, 328, 368 and 398 and appear to have knowledge of the facts underlying the allegations in these MURS. These individuals are: Lyndon LaRouche (Presidential candidate, CTEL; Chairman, NCLC and USLP); Lawrence Hecht (bookkeeper, CTEL); Ellen Berg (Vice President, New Solidarity); Majorie Mazel (Chairperson, incorporator, New Solidarity); Dr. Stephen Pepper (Comptroller, Campaigner Publications; also has ties to CTEL and USLP); Marcia Mary Pepper (Chairman, national committee staff, CTEL); Ed Spannas (stockholder and director, Campaigner Publications; also associated with NCLC); Nancy Spannas (stockholder and director, New Solidarity; incorporator, Campaigner Publications; also associated with NCLC); Richard Welsh; (Treasurer, CTEL and USLP).

Subpoenas for the depositions are attached. Although dates for the deposition have been set, these may have to be changed in the event the records sought in the subpoenas duces tecum are not timely produced.



McC 662

JOEL D. JOSEPH

ATTORNEY AT LAW
SUITE 1010
1712 EYE STREET, N.W.
WASHINGTON, D.C. 20006

(202) 338-5560
(202) 338-5482

June 13, 1977

William C. Oldaker
General Counsel
Federal Election Commission
Washington, D.C. 20463

771812

Dear Mr. Oldaker,

RE: MUR 398 (77)

This letter is to inform you that I am representing the Committee to Elect Lyndon LaRouche (CTEL), the United States Labor Party (USLP) and the National Caucus of Labor Committees (NCLC) in MUR 398 (77). Before I make a detailed response to your charges I need a clarification.

We hereby request that the Federal Election Commission grant a stay in the proceedings concerning all MURs and compliance actions pending against CTCL, USLP and NCLC until Jones v. Unknown Agents of the Federal Election Commission, U.S. District Court for the District of Columbia Civil Action No. 77-0732 is decided. Please put this item on the Commission's agenda within one week and advise me of its progress. If a satisfactory response to this request is not made within ten (10) days I may seek a protective order from the District Court here.

You claim that CTCL made false and misleading statements. We request that this charge be explained in detail and made more specific. What statements are you referring to? State all reasons that the Commission believes that these statements were either false or misleading.

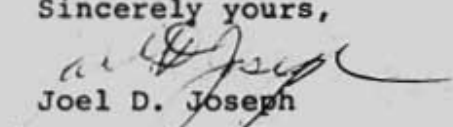
Concerning the Commission's charge that the USLP, CTCL and NCLC are "affiliated", what sections of the regulations or of the statute does the Commission believe has been breached? Your regulations, which have recently become effective, but were not in effect when the reports in question were filed, contains different categories of "affiliated" organizations. Which category does the Commission believe that USLP, CTCL and NCLC come within?

We believe that the Commission's requests for additional documents are unduly burdensome and oppressive, and are

unnecessary harassment of minor political organizations.

Concerning all elements of MUR 398 (77), please supply me with copies of all documents or other evidence that led the Commission to believe that the campaign laws have been violated. Please list all sources for these documents and the circumstances surrounding their discovery. Please provide me with a copy of all Commission decisions made concerning the investigation of this matter.

Sincerely yours,

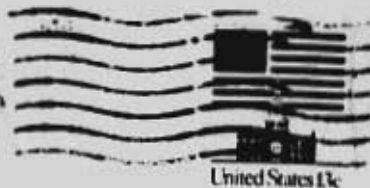

Joel D. Joseph

c.c. Chairman Harris
Staff Director Potter

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JOEL D. JOSEPH
ATTORNEY AT LAW
SUITE 1010
1712 EYE STREET, N. W.
WASHINGTON, D. C. 20006

FED



William Oldaker
General Counsel
Federal Election Commission
Washington, D.C. 20463

3 1 0 1 7 0 0

LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20008

(202) 338-8560

771803

June 13, 1977

William Oldaker
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

This letter is to inform you that I will be counsel to Campaigner Publications, Inc., with regard to your letter of May 13, 1977, MUR 398(77).

Before we can respond properly to your letter, please provide me with a copy of the Commission's determination that indicates the finding of reason to believe, along with any supporting documents relating thereto. Thank you.

Sincerely,


Paul D. Kamenar

LAW OFFICES
PAUL D. KAMENAR

1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006



77 JUN 13 1977

William Oldaker
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ACC 658

LAW OFFICES
PAUL D. KAMENAR
1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006

771305

(202) 338-5560

June 11, 1977

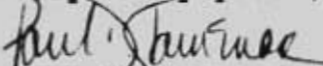
William Oldaker
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

This letter is to inform you that I will be counsel to New Solidarity International Press Services, Inc., in regard to your MUR 398(77).

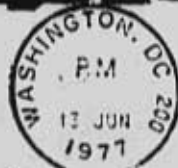
Before we can properly respond in this matter, will you please provide me with a copy of the Commission's certification or other such document with any supporting materials wherein the Commission found reason to believe a violation of 2 U.S.C. 441b. Thank you.

Very truly yours,


Paul D. Kamenar

LAW OFFICES
PAUL D. KAMENAR

1712 EYE STREET, N.W.
SUITE 1010
WASHINGTON, D.C. 20006



DISTRICT OF COLUMBIA
NATIONAL CIVIL RIGHTS MONTH
CIVIL RIGHTS SERVING



William Oldaker
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P. O. Box 1972
New York, New York 10001

Re: MUR 398 (77)

Dear Ms. Pepper:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the Committee to Elect Lyndon LaRouche has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter, designated as MUR 398 (77), has been consolidated with MURs 281, 328 and 368 of which you were previously notified.

To date the Commission has received no response from the Committee concerning these alleged violations of the Act. The Commission therefore requests that the Committee submit its response to all of these matters within 5 days of receipt of this letter. The Committee is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P. O. Box 1972
New York, New York 10001

Re: MUR 398 (77)

Dear Ms. Pepper:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the Committee to Elect Lyndon LaRouche has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter, designated as MUR 398 (77), has been consolidated with MURs 281, 328 and 368 of which you were previously notified.

To date the Commission has received no response from the Committee concerning these alleged violations of the Act. The Commission therefore requests that the Committee submit its response to all of these matters within 5 days of receipt of this letter. The Committee is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/8/77

cc: MUR 398 (77)



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Campaigner Publications, Inc.
Edward Spannus, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. Spannus:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that Campaigner Publications has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from Campaigner Publications concerning the alleged violation. The Commission therefore requests that Campaigner Publications submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

A handwritten signature in cursive script, reading "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Campaigner Publications, Inc.
Edward Spannus, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. Spannus:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that Campaigner Publications has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from Campaigner Publications concerning the alleged violation. The Commission therefore requests that Campaigner Publications submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/8/77
cc: Mur 398 (77)

PS Form 3811, Mar. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 398 **GC**

● **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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ **RESTRICTED DELIVER**
Show to whom and date delivered..... 65¢

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Campaigner Publications, Inc.
Edward Spannus 398 (77)

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943338	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

Edward Spannus

4. DATE OF DELIVERY **POSTMARK**

6-6-17

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

New Solidarity International Press Service, Inc.
Marjorie Mazel, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Ms. Mazel:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that New Solidarity International Press Service (NSIPS) has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NSIPS concerning the alleged violation. The Commission therefore requests that NSIPS submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

New Solidarity International Press Service, Inc.
Marjorie Mazel, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Ms. Mazel:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that New Solidarity International Press Service (NSIPS) has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NSIPS concerning the alleged violation. The Commission therefore requests that NSIPS submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/8/77
cc: Mur 398 (77)

GC MUR 398

PS Form 3811, Mar. 1976

● 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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Marjirie Mazel, President

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943339	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

Pete Davis

4. DATE OF DELIVERY POSTMARK

6-13

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Caucus of Labor Committees
Lyndon LaRouche, Chairman
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the National Caucus of Labor Committees (NCLC) has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NCLC concerning the alleged violations. The Commission therefore, requests that NCLC submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Caucus of Labor Committees
Lyndon LaRouche, Chairman
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the National Caucus of Labor Committees (NCLC) has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NCLC concerning the alleged violations. The Commission therefore, requests that NCLC submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/8/77
cc: MUR 398 (77)



FEDERAL ELECTION COMMISSION

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

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

United States Labor Party
Lyndon LaRouche, Chairman
321 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the United States Labor Party (USLP) has violated 2 U.S.C. §433(b)(2). The matter has been designated as MUR 398 (77).

To date the Commission has received no response from USLP concerning the alleged violation. The Commission therefore, requests that USLP submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

United States Labor Party
Lyndon LaRouche, Chairman
321 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the United States Labor Party (USLP) has violated 2 U.S.C. §433(b)(2). The matter has been designated as MUR 398 (77).

To date the Commission has received no response from USLP concerning the alleged violation. The Commission therefore, requests that USLP submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/6/77
cc: MUR 398 (77)

3 6 4 0 3 7 0 7 1
Committee to Elect LaRouche
231 West 29th Street
New York, New York 10001



PROCLAIM LIBERTY THROUGHOUT THE LAND
FIGHT DISEASE
SUPPORT CITY OF HOP
PILOT MEDICAL CENTER



1977 JUN 4 PM 1:12

Thomas Harris, Chairman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Lyndon LaRouche *for President*

Wayne Evans *for Vice President*

Sec # 614

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001
Telephone: (212) 563-8600
Marcia Merry, Chairman
Richard Welsh, Treasurer

771735

June 3, 1977

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

Special Attention: Thomas E. Harris, Chairman
Joan D. Aikens, Vice Chairman

SUBJECT: Unconstitutional Harassment of a Political
Minority Party

Gentlemen:

In respect of your demands for further information.

Your organization is presently the defendant in two suits before the Federal courts, for reason of your improper and most extraordinarily discriminatory practices against the Committee to Elect LaRouche and its supporters. By this action, by your hideously unconstitutional rulings of April 1977 respecting imputed campaign contributions, and by your actions implementing such unconstitutional, self-serving ruling, your agency is engaged in attempting to tear the U.S. Constitution to shreds.

Moreover, your actions to the cited effect are overwhelmingly tainted with the color of massive corruption in abuse of office by the Carter administration, far exceeding in this respect any offense alleged before the Congress in proceedings against the administration of President Nixon.

Firstly, your rulings of April 1977 relevant to your purported inquiry are a defiance of every aspect of the First Amendment respecting freedom of association and freedom of the press.

...2

Vote U.S. Labor Party 1976

Secondly, if your measures were to be applied to the New York Times, the Ford Foundation, the Russell Sage Foundation, the networks of organizations linked with the Institute for Policy Studies, the foundations funding environmentalist groups, and so forth, there are few aspects of current public support for the Carter administration and its programs which would not be found in gross violation of your rulings. In fact, to our present knowledge, there has been no significant application of such rulings to this effect against organizations supporting the Carter Administration and or its energy proposals, but there is an effort to massively apply the unconstitutional measures to various persons and institutions which are critical of the Carter administration or of its energy proposals.

For this reason, your inquiry is not only in such flagrant violation of the constitution as to constitute an impeachable prima facie repudiation of your oaths of office, but represent unconstitutional action representing in intent and effect the most monstrous, impeachable partisan abuse of office by the Carter Administration.

Members of the Nixon Administration were indicted, convicted and even imprisoned for far less abuse of office than is typified by your actions.

Your actions are otherwise despicably ironical in light of the Carter Administration's self-righteous posturing on the issue of "human rights." Is there not at least some shred of honor of simple decency left among your ranks?

Proper legal response concerning your latest affront against the U.S. Constitution is being taken under advisement with appropriate legal counsel. In the meantime, this response, which will be circulated by means of copies to relevant persons and institutions, should be taken as my official response to your outrageous conduct in the cited matters.

Sincerely,

Lyndon Hermyle LaRouche, Jr.
Chairman, U.S. Labor Party

Marcia Merry Pepper
Marcia Merry Pepper,
Chairman,
Committee to Elect LaRouche

Committee to Elect Lyndon LaRouche
P. O. Box 1972, G.P. O.
New York, NY 10001



Attention: Thomas E. Harris,
Chairman

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

REGISTERED

LC. 380967

LYNDON LaROUCHE FOR 1 PRESIDENT

WAYNE EVANS FOR VICE PRESIDENT

Committee to Elect Lyndon LaRouche

Marcia Merry, Chairman

Richard Welsh, Treasurer

P.O. Box 1972, G.P.O. New York, N.Y. 10001

file #619

771733

May 31, 1977

Thomas E. Harris, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Our file: MUR 77-2

Dear Mr. Harris:

This is a request under the Freedom of Information Act as amended (5 U.S.C. § 552).

I am requesting: (1) Copies of all memoranda, reports, directives, letters, notes, or other documents pertaining to the Committee to Election Lyndon LaRouche, maintained by the FEC Compliance and Disclosure Division or other division or section of the FEC, in connection with the application of this Committee for primary matching funds in the 1976 election campaigns.

(2) Copies of all interagency communications, memoranda, logs or notes of telephone conversations, or other documents exchanged between the FEC and other government agencies, including but not limited to:

- a) the Department of Justice and its various divisions, including its Public Integrity Section,
- b) the Federal Bureau of Investigation,
- c) the Internal Revenue Service,
- d) the Central Intelligence Agency, and
- e) the National Security Council.

(3) Records or documents pertaining to any contributors, creditors or vendors of this Committee, except insofar as such material is already included in the accompanying requests.

The period covered by this request is the period during which this Committee has been filing reports with the FEC. Request (2) is of course communications pertaining to this Committee.

Vote U.S. Labor Party 1976

As you know, the amended Act provides that if some parts of a file are exempt from release that "reasonably segregable" portions shall be provided. I therefore request that, if you determine that some portions of the requested documents are exempt, you provide me immediately with a copy of the remainder of each document. I reserve, of course, my right to appeal any such decisions.

If you determine that any document or portion thereof is exempt from disclosure, I request that you provide me with an index and itemization of each document or portion thereof which is withheld from disclosure, together with the alleged statutory justification for such withholding. See, Virginia v. Rosen, 157 U.S. App. D.C. 310, 104 F. 2d 820 (1973), cert. denied, 415 U.S. 977 (1974).

I am prepared to pay reasonable costs for locating the requested documents and reproduction thereof.

As you know, the amended Act permits you to reduce or waive the fees if it "is in the public interest because furnishing the information can be considered as primarily benefitting the public." I believe that this request plainly fits that category and I ask you to waive any fees.

If you have any questions concerning this request, please telephone me at the above number.

As provided for in the amended Act, I will expect to receive a reply within ten working days.

Sincerely yours,

Marcia Merry Pepper

Marcia Merry Pepper,
Chairman,
Committee to Elect LaRouche

Sworn to before me this

31 day of May, 1977.

Marie Mendez

MARIE MENDEZ
Notary Public State of New York
No. 314620518
Qualified in New York County
Commission Expires March 30, 1979

ACC # 615

National Caucus of Labor Committees

P.O. Box 1972, GPO, New York, N.Y. 10001 (212)563-8600

May 31, 1977

771734

Thomas E. Harris, Chairman
Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463

Our file: MUR 77-1

Dear Mr. Harris:

This is a request under the Freedom of Information Act as amended (5 U.S.C. § 552).

I am requesting: (1) Copies of all memoranda, reports, directives, letters, notes, or other documents pertaining to the National Caucus of Labor Committees, which are maintained by the FEC Compliance and Disclosure Division or other division or section of the FEC, in connection with the application of the Committee to Elect Lyndon LaRouche for primary matching funds in the 1976 election campaign.

(2) Copies of all interagency communications, memoranda, logs or notes of telephone conversations, or other documents exchanged between the FEC and other government agencies, including but not limited to

- a) the Department of Justice and its various divisions, including its Public Integrity Section,
- b) the Federal Bureau of Investigation,
- c) the Internal Revenue Service,
- d) the Central Intelligence Agency, and
- e) the National Security Council.

(3) Records of any contact or communication with vendors or creditors of the NCLC, including but not limited to:

- a) New York Telephone
- b) Consolidated Edison, New York City
- c) Niles Realty Company
- d) Michigan Bell
- e) Southern Pacific Communications, and
- f) Vanguard Offset Printers.

Requests (1) and (3) should cover the period from October 1976 to the present. Request (2) should cover the years 1975 to the present.

As you know, the amended Act provides that if some parts of a file are exempt from release that "reasonably segregable" portions shall be provided. I therefore request that, if you determine that some portions of the requested documents are exempt, you provide me immediately with a copy of the remainder of each document. I reserve, of course, my right to appeal any such decisions.

If you determine that any document or portion thereof is exempt from disclosure, I request that you provide me with an index and itemization of each document or portion thereof which is withheld from disclosure, together with the alleged statutory justification for such withholding. See, *Vaughn v. Rosen*, 157 U.S. App. D.C. 340, 134 F. 2d 820 (1973), cert. denied, 415 U.S. 977 (1974).

I am prepared to pay reasonable costs for locating the requested documents and reproduction thereof.

As you know, the amended Act permits you to reduce or waive the fees if it "is in the public interest becausee furnishing the information can be considered as primarily benefitting the public." I believe that this request plainly fits that category and I ask you to waive any fees.

If you have any questions concerning this request, please telephone me at the above number.

As provided for in the amended Act, I will expect to receive a reply within ten working days.

Sincerely yours,

Warren Hamerman

Warren Hamerman
Director of Organization
NCLC

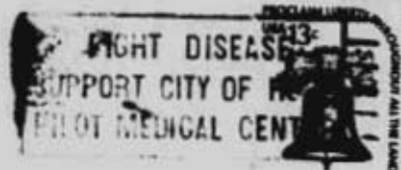
Sworn to before me

this 31 day of May, 1977.

Marie Mendez

MARIE MENDEZ
Notary Public State of New York
No. 31-4620518
Qualified in West York County
Commission Expires March 30, 1979

33 7 10 3 7 2 6



FOR ELECTION
JANUARY

'77 JUN ... 1:12

Thomas Harris, Chairman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

ACC#617

CAMPAIGNER PUBLICATIONS, INC.

231 West 29th Street, New York, N.Y. 10001
Business 563-8635 Production 563-8629

10:30
May 31, 1977

Thomas E. Harris, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

771711

Our file: MUR 77-3

Dear Mr. Harris:

This is a request under the Freedom of Information Act as amended (5 U.S.C. § 552).

I am requesting: (1) Copies of all memoranda, reports, directives, letters, notes or other documents pertaining to Campaigner Publications, Inc., which are maintained by the FEC Compliance and Disclosure Division or other division or section of the FEC, in connection with the application of the Committee to Elect Lyndon LaRouche for primary matching funds in the 1976 election campaign.

(2) Copies of all interagency communications, memoranda, notes or logs of telephone conversations, or other documents exchanged between the FEC and other government agencies during the period 1975 to the present, pertaining to Campaigner Publications, including but not limited to:

- a) the Department of Justice and its various divisions, including its Public Integrity Section,
- b) the Federal Bureau of Investigation,
- c) the Internal Revenue Service,
- d) the Central Intelligence Agency,
- e) the National Security Council.

(3) Records of any contact or communication with vendors or creditors of the Campaigner Publications, including:

- a) Graphic Credit,
- b) Compugraphic
- c) Graphic Services
- d) Hertz
- e) Vanguard Offset Printers.

As you know, the amended Act provides that if some parts of a file are exempt from release that "reasonably segregable" portions shall be provided. I therefore request that, if you determine that some portions of the requested documents are exempt, you provide me immediately with a copy of the remainder of each document. I reserve, of course, my right to appeal any such decisions.

If you determine that any document or portion thereof is exempt from disclosure, I request that you provide me with an index and itemization of each document or portion thereof which is withheld from disclosure, together with the alleged statutory justification for such withholding. See, Vaughn v. Rosen, 157 U.S. App. D.C. 340, 434 F. 2d 820 (1973), cert. denied, 415 U.S. 977 (1974).

I am prepared to pay reasonable costs for locating the requested documents and reproduction thereof.

As you know, the amended Act permits you to reduce or waive the fees if it "is the public interest becausee furnishing the information can be considered as primarily benefitting the public." I believe that this request plainly fits that category and I ask you to waive any fees.

If you have any questions concerning this request, please telephone me at the above number.

As provided for in the amended Act, I will expect to receive a reply within ten working days.

Sincerely yours,

Barbara M. Boyd

Barbara Miles Boyd,
Secretary,
Campaigner Publications, Inc.

*Seen to before me this
31 day of May, 1977.*

Marie Mendez

MARIE MENDEZ
Notary Public State of New York
No. 31-4620518
Qualified in New York County
Commission Expires March 30, 1977



U.S. Labor Party

P.O. BOX 1972 • NEW YORK, N.Y. 10001 • TELEPHONE (212) 563-8600

See #616

771712

May 31, 1977

Thomas E. Harris, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Our file: MUR 77-4

Dear Mr. Harris:

This is a request under the Freedom of Information Act as amended (5 U.S.C. 552).

I am requesting: (1) Copies of all memoranda, reports, directives, letters, notes or other documents pertaining to the U.S. Labor Party, which are maintained by the FEC Compliance and Disclosure Division or other division or section of the FEC, in connection with the application of the Committee to Elect Lyndon LaRouche for primary matching funds in the 1976 election campaign.

(2) Copies of all interagency communications, memoranda, logs or notes of telephone conversations, or other documents pertaining to the U.S. Labor Party exchanged between the FEC and other government agencies, including but not limited to:

- a) the Department of Justice and its various divisions, including its Public Integrity Section,
- b) the Federal Bureau of Investigation,
- c) the Internal Revenue Service,
- d) the Central Intelligence Agency, and
- e) the National Security Council.

(3) Records of any contact with contributors, vendors or creditors of the U.S. Labor Party.

Requests (1) and (3) should cover the period from October 1976 to the present. Request (2) should cover the years 1975 to the present.

As you know, the amended Act provides that if some parts of a file are exempt from release that "reasonably segregable" portions shall be provided. I therefore request that, if you determine that some portions of the requested documents are exempt, you provide me immediately with a copy of the remainder of each document. I reserve, of course, my right to appeal any such decisions.

If you determine that any document or portion thereof is exempt from disclosure, I request that you provide me with an index and itemization of each document or portion thereof which is withheld from disclosure, together with the alleged statutory justification for such withholding. See, Vaughn v. Rosen, 157 U.S. App. D.C. 340, 484 F. 2d 820 (1973), cert. denied, 415 U.S. 977 (1974).

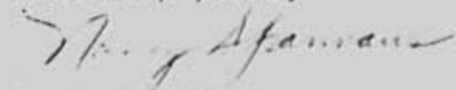
I am prepared to pay reasonable costs for locating the requested documents and reproduction thereof.

As you know, the amended Act permits you to reduce or waive the fees if it "is the public interest becausee furnishing the information can be considered as primarily benefitting the public." I believe that this request plainly fits that category and I ask you to waive any fees.

If you have any questions concerning this request, please telephone me at the above number.

As provided for in the amended Act, I will expect to receive a reply within ten working days.

Sincerely yours,



Nancy Spannaus,
Organizational Secretary,
U.S. Labor Party

Seen to before me this

31 day of May, 1977.

Marie Mendez

MARIE MENDEZ
Notary Public State of New York
No. 31-4620519
Qualified in New York County
Commission Expires March 30, 1979

U.S. Labor Party
P.O. Box 1972
New York, New York 10001



FIGHT DISEASE
SUPPORT CITY OF HO
PILOT MEDICAL CENT



Thomas Harris, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

NEW SOLIDARITY INTERNATIONAL PRESS SERVICE

See #618



231 W. 29th St., New York, New York 10033
Telephone: 212-563-8622

771741

May 31, 1977

Thomas E. Harris, Chairman
Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463

Our file: MUR 77-5

Dear Mr. Harris:

This is a request under the Freedom of Information Act, as amended (5 U.S.C. § 552).

I am requesting: (1) Copies of all memoranda, reports, directives, letters, notes, or other documents pertaining to New Solidarity International Press Service (NSIPS), which are maintained by the FEC Compliance and Disclosure Division or other division or section of the FEC, in connection with the application of the Committee to Elect Lyndon LaRouche for primary matching funds in the 1976 election campaign.

(2) Copies of all interagency communications, memoranda, logs or notes of telephone conversations, or other documents pertaining to NSIPS, exchanged between the FEC and other government agencies, including but not limited to:

- a) the Department of Justice and its various divisions, including its Public Integrity Section;
- b) the Federal Bureau of Investigation,
- c) the Internal Revenue Service,
- d) the Central Intelligence Agency, and
- e) the National Security Council.

(3) Records of any contact or communication with vendors or creditors of NSIPS, including:

- a) Leasco Corporation (Alanthus Data Communications),
- b) Western Union International, and
- c) RCA Global Communications.

Requests (1) and (3) should cover the period from October 1976 to the present. Request (2) should cover the years 1975 to the present.

As you know, the amended Act provides that if some parts of a file are exempt from release that "reasonably segregable" portions shall be provided. I therefore request that, if you determine that some portions of the requested documents are exempt, you provide me immediately with a copy of the remainder of each document. I reserve, of course, my right to appeal any such decisions.

If you determine that any document or portion thereof is exempt from disclosure, I request that you provide me with an index and itemization of each document or portion thereof which is withheld from disclosure, together with the alleged statutory justification for such withholding. See, Vaughn v. Rosen, 157 U.S. App. D.C. 340, 484 F. 2d 320 (1973), cert. denied, 415 U.S. 977 (1974).

I am prepared to pay reasonable costs for locating the requested documents and reproduction thereof.

As you know, the amended Act permits you to reduce or waive the fees if it "is the public interest becausee furnishing the information can be considered as primarily benefitting the public." I believe that this request plainly fits that category and I ask you to waive any fees.

If you have any questions concerning this request, please telephone me at the above number.

As provided for in the amended Act, I will expect to receive a reply within ten working days.

Sincerely yours,

Marjorie Mazel
Marjorie Mazel,
President
NSIPS

Sworn to before me this

31 day of May, 1977.

Marie Mendez

MARIE MENDEZ
Notary Public State of New York
No. 31-4620518
Qualified in New York County
Commission Expires March 30, 1979

New Solidarity International's Press Service
231 West 29th Street
New York, N.Y. 10001



THOMAS HARRIS, CHAIRMAN
Federal Election Commission
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

Ms. Debbie Moore
United Reporting Service
514 Market Tower Building
Wilmington, Delaware

May 20, 1977

Dear Ms. Moore;

We are sending you back both copies of the deposition you took for the Federal Election Commission on April 27, 1977. The corrections should be made pursuant to the telephone conversation you had with Biz Van Gelder on May 19, 1977.

In addition, we would like a copy sent to Donald York for his signature. It is both our impressions that Mr. York did not waive his reading and signing of the deposition.

We appreciate your cooperation and promptness in this matter.

Sincerely yours,

David Spiegel
Attorney

Van Gelder:caw:5/12 20/77

Docket

March 16, 1977

Mr. George Gross
Executive Director
Budget Committee
United States House of Representatives
Washington, D. C. 20515

Dear Mr. Gross:

This is in response to your telephone request to me of March 9, 1977 for a brief description of the Federal Election Commission's activity regarding the request of the Committee to Elect Lyndon LaRouche (CTEL) for matching funds.

On October 15, 1976, the CTEL submitted a request for matching funds. The pattern of contributions combined with the extreme narrowness of the margin by which the CTEL's listed contributions exceeded the matching fund threshold limits left the audit team with substantial doubts as to whether initial certification should be authorized. It was proposed to the Commission by this office that further verification of the contributions be made, which proposal was approved. Notification letters were sent to representatives of the CTEL, and joint teams of investigators and auditors were dispatched to three states.

Based on discrepancies in the reporting of individual contributions, CTEL's request for matching funds was denied by the Commission. The CTEL and the U. S. Labor Party subsequently filed suit against the FEC, challenging its denial of the funds. That suit is now pending in the U. S. Court of Appeals for the District of Columbia.

The following is a chronology of events in this matter:

October 15, 1976 -- Request for matching funds
was made by the CTEL.

- October 21, 1976 -- FEC posed questions to the CTCL to which answers were needed before further action could be taken on the request.
- October 23, 1976 -- CTCL answered some of the FEC's questions.
- October 27, 1976 -- A meeting took place between representatives of the FEC and of the CTCL, including CTCL's attorney, David Heller. A print-out of CTCL's audit was reviewed.
- November 1, 1976 -- CTCL paid \$90,000 for television time. That amount could not be accounted for in the audit discussed at the October 27 meeting, and that fact further complicated and delayed the handling of CTCL's request.
- November 4, 1976 -- Commission approved a matching fund threshold audit.
- January 21, 1977 -- Notification to CTCL of
- a. individual verification check of contributions
 - b. audit of its books
- to occur on January 26, 1977.
- January 26, 1977 -- Audit of CTCL books was conducted in New York. Individual verification checks were conducted in three states (Wisconsin, Delaware, and Massachusetts).
- January 27, 1977 -- FEC receipt of U. S. Labor Party and CTCL 30-day post election reports.
- February 10, 1977 -- CTCL's request for matching funds was denied (see attached memorandum).
- February 14, 1977 -- CTCL and the U. S. Labor Party filed suits against the FEC in U. S. Court of Appeals for the District of Columbia, as is the Committee's right under 96 U.S.C. 2041.

The current status of the matter is that the CTCL's suit is pending, and the Federal Election Commission has 40 days from the date of filing to respond.

I hope this information is helpful to you. If I can be of further assistance, please let me know.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

SKatz:ln:3/16/77

100-1037073



FEDERAL ELECTION COMMISSION

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

February 8, 1977

COMMISSIONER MEMO #1165

MEMORANDUM TO: Commissioners
THROUGH: Orlando B. Potter
FROM: *GML* Drew McKay/Bob Costa
SUBJECT: CERTIFICATION REPORTS FOR COMMISSION MEETING
OF FEBRUARY 8, 1977

Attached are the following:

II. Certification

- A. Status chart on Presidential Primary Matching Funds
- B. Eligibility
- C. Certification report and letter, to the Secretary of the Treasury, for one candidate

The status chart on Presidential Nominating Convention Payments is not included as no additional payments have been made.

AGENDA ITEM

For Meeting of: 2-10-77

Agenda Item No: II

Exhibit No: II





FEDERAL ELECTION COMMISSION

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

February 10, 1977

REPORT OF THE COMPLIANCE REVIEW SECTION
OFFICE OF COMPLIANCE
FEDERAL ELECTION COMMISSION
ON
COMMITTEE TO ELECT LYNDON LaROUCHE

I. BACKGROUND

As directed by the Commission, an audit was conducted of the Committee to Elect Lyndon LaRouche pursuant to Section 438(a)(8) of Title 2 of the United States Code (2 U.S.C. 438(a)(8)). This report only addresses whether the candidate has satisfied the provisions of Section 9033(b)(3) and (4) of Title 26 of the United States Code (26 U.S.C. 9033(b)(3) and (4)). Other eligibility requirements as stated in 26 U.S.C. 9033 are not addressed in this report.

The Compliance Review Section examined the reports and records of the Committee to Elect Lyndon LaRouche for a 14-month period ending October 18, 1976. Our examination was made in accordance with generally accepted auditing standards, including appropriate tests of accounting records and other auditing procedures necessary under the circumstances.

The findings and conclusions contained in this report are rendered on the basis of the audit performed and the definition of contribution under 26 U.S.C. 9034, as amplified by Section 130.8 and 131.1 of the Commission's Proposed Regulations governing eligibility, the Guideline for Presentation in Good Order, and upon the advice and guidance provided by the Commission's Office of General Counsel.

II. FINDINGS AND CONCLUSIONS

On January 14, 1977 the Commission approved the direct contacting of contributors to verify contributions in three states: Delaware, Massachusetts, and Wisconsin. Based on the results of these confirmations, outlined in the attached chart, the Committee to Elect LaRouche has not satisfied the provisions of Section 9033(b)(3) and (4) of Title 26 of the United States Code (26 U.S.C. 9033(b)(3) and (4)) requiring the receipt of an excess of \$5,000 in matchable contributions in amounts of \$250 or less in each of twenty states.



**ANALYSIS OF CONTRIBUTION CONFIRMATION FOR
THE COMMITTEE TO ELECT LYNDON LA ROCHE**

STATES

	Delaware	Massachusetts	Wisconsin
Number of Interviews Attempted	23	26	21
<u>COULD NOT LOCATE:</u>			
Contributor . Not at Home		11 \$1,900.60	8 \$1,950.00
Insufficient Time to Locate		6 \$1,435.00	2 \$ 500.00
Did Not Live at Address	16 \$3,681.50	1 \$ 140.00	2 \$ 499.50
No Such Address			2 \$ 430.00
Unknown by Listed Employer		1 \$ 250.00	
<u>PERSONS CONTACTED:</u>			
Refused to be Interviewed		6 \$ 789.00	2 \$ 499.72
Confirmed All of Contribution	5 \$1,002.00	1 \$ 250.00	
Confirmed a Portion of Contribution	1 \$ 80.00 <u>1/</u>		2 \$ 125.00 <u>2</u>
Denied Making Contribution			1 \$ 250.00
Confirmed But Not Own Funds Used	1 \$ 250.00		
Confirmed But Portion from Sale of New Solidarity			2 \$ 496.40
Contribution Verified In-House	\$5,036.75	\$5,159.85	\$5,172.62
Verified Amount After Contributor Contact	\$ 935.25	\$4,769.85	\$3,256.72

1/ Confirmed \$80 of \$250 contribution; \$170 was collected from roommates.

2/ Contributor confirmed \$100 of a \$250 contribution.
Contributor confirmed \$25 of a \$115 contribution.



FEDERAL ELECTION COMMISSION

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

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P.O. Box 1972
GPO New York, New York 10001

May 13, 1977

Re: MUR 398 (77)

Dear Ms. Pepper:

This letter is to inform you that the Commission has determined it has reason to believe that the Committee to Elect Lyndon LaRouche has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the Act). The provisions at issue and the evidence underlying the violations are listed below. The violations are in addition to those noted in MURs 281, 328, and 368 about which you were notified under separate cover.

1. The Commission has found reason to believe that CTCL has violated 26 U.S.C. §9042(c)(1) by making false and misleading statements in reports for certifications. The basis of the allegation lies in the Commission's continuing investigation of MURS 368, 328 and 281 and on information ascertained in review of all documents submitted by your committee during the calendar year 1976.

2. The personnel overlap between USLP, NCLC, and CTCL, in addition to common addresses, similar patterns of contributions, possibly interconnected expenditure patterns, and substantial transfers of funds among the groups appears to indicate that USLP, CTCL and NCLC are all affiliated committees and therefore are in violation of 2 U.S.C. 433(b)(2) for failing to report such affiliation.

In connection with our investigation into the above referenced violations, and our investigation in conjunction with MURs 281, 328, and 368, the Commission will need to update the review of your records which began last October.



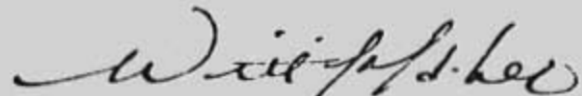
We request that the following materials be made available:

1. Copies of all receipts from contributors, fundraising events, or loans from October 16, 1976, to the present.
2. Records of all expenditures made by CTEL from October 18, 1976, to present, with copies of the invoices which reflect the services received for payments made.
3. Copies of all loan agreements with lenders to CTEL. Please include the interest and amount of principal still outstanding.
4. All records and documents dealing with transfers of money by your committee to NCLC. We have attached the pages of reports listing the transfers in question.

This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this case is Biz Van Gelder (telephone no. 202/523-4175). For your information, the Commission intends to handle its investigation of MURs 281, 328, 368 and 398 on a consolidated basis.

Please note that under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action shall be taken against you. Accordingly, in addition to those materials sought herein, please feel free to submit any other evidence you deem relevant.

Sincerely yours,



William Oldaker
General Counsel

cc: Joel Joseph



FEDERAL ELECTION COMMISSION

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

May 13, 1977

Marjorie Mazel, President
New Solidarity International
Press Service, Inc.
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Ms. Mazel:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe that New Solidarity International Press Service has violated 2 U.S.C. 441b by making illegal contributions in-kind to the United States Labor Party and the Committee to Elect Lyndon LaRouche.

The Commission's decision is based on its analysis of the reports filed during the calendar year by the United States Labor Party and the Committee to Elect Lyndon LaRouche. Our review of these reports has ascertained a heavy accumulation of debt to your corporation by the Committee to Elect Lyndon LaRouche and the United States Labor Party over a substantial period of time without any significant repayment. Accordingly, these debts may be viewed as contributions in-kind until repaid. Since 2 U.S.C. 441b(a) prohibits corporate contributions in any form, and since New Solidarity International Press Service lists itself as a corporation there is reason to believe that New Solidarity International Press Service has violated the Act.

Under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission the Commission requests that your corporation make the following information available for review.

1. Records of all debts owed by the Committee to Elect Lyndon LaRouche (CTEL) and United States Labor Party (USLP) in connection with the committee expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL; records of all deposits of such payments.



2. All records containing a description of services rendered on behalf of the 1976 presidential campaign of Mr. LaRouche and, wherever possible representative samples of said services.

3. Copies of your corporation's financial statements for fiscal years 1975 and 1976.

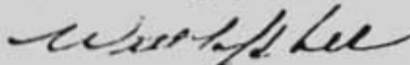
4. Copies of any cash flow statements for your corporation for fiscal years 1975 and 1976.

Under the Act the Commission is required to conduct its investigation expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET NW.
WASHINGTON, D.C. 20463

Campaigner Publications, Inc.
Edward Spannus, President
231 West 29th Street
New York, New York

May 13, 1977

Re: MUR 398 (77)

Dear Mr. Spannus:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe that Campaigner Publications has violated 2 U.S.C. 441b by making illegal contributions in-kind to the United States Labor Party and the Committee to Elect Lyndon LaRouche.

The Commission's decision is based on its analysis of the reports filed during the calendar year by the United States Labor Party and the Committee to Elect Lyndon LaRouche. Our review of these reports has ascertained a heavy accumulation of debt to Campaigner Publications by the Committee to Elect LaRouche over a substantial period of time without any significant repayment. Accordingly, these debts may be viewed as contributions-in-kind. Since 2 U.S.C. 441b prohibits corporate contributions in any form, and since Campaigner Publications lists itself as a corporation, there is reason to believe that Campaigner Publications has violated the Act.

Under 2 U.S.C. §437g(a)(4), you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission, the Commission requests that your corporation make the following information available for review:

1. Records of all debts owed by the Committee to Elect Lyndon LaRouche (CTEL) to Campaigner Publications in connection with the committee's expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTET; records of all deposits of said payments.



2. All records containing a description of services rendered on behalf of the 1976 presidential campaign of Mr. LaRouche and, where possible a sample of said services.

3. Copies of your Corporation's financial statements for fiscal years 1975 and 1976.

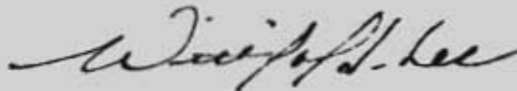
4. Copies of any cash flow statements for your Corporation for fiscal years 1975 and 1976.

Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

United States Labor Party
Lyndon LaRouche, Chairman
321 West 29th St.
New York, New York

May 13, 1977

Re: MUR 398 (77)

Dear Mr. LaRouche:

This letter is to notify you that the Commission has found that there is reason to believe that the United States Labor Party has violated 2 U.S.C. §433(b)(2) by not reporting the affiliation with the National Caucus of Labor Committees and the Committee to Elect Lyndon LaRouche.

The personnel overlap among USLP, NCLC and CTCL, in addition to common addresses, similar patterns of contributions, possibly inter-connected expenditure patterns, and substantial transfers of funds among the group appears to indicate that NCLC, CTCL and USLP are all affiliated committees.

In this connection, it also appears to us, from a surface reading of USLP reports, that USLP may have a large number of contributions to the LaRouche 1976 Presidential Campaign which are not specifically delineated as such. These would count against the limitations set forth in 2 U.S.C. §441a.

Under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission the Commission requests that the following materials be made available:

1. Your party set forth a number of entries (see attached copies) in its reports which bear the notation "Creditor of NCLC". For each entry please describe: (a) the explicit purpose for which it was made; (b) the person(s) making the expenditure.



0010070743

398

PS Form 3811, Mar. 1976

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).		
<input type="checkbox"/> Show to whom and date delivered.....		15¢
<input type="checkbox"/> Show to whom, date, & address of delivery..		35¢
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered.....		65¢
<input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery		85¢
2. ARTICLE ADDRESSED TO: <i>John J. ... 231 West 31st St. New York N.Y.</i>		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
4. DATE OF DELIVERY <i>5/26</i>		POSTMARK
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

Please supply any records which document the information in your answers.

2. Records of payments to Niles Realty, as well as records of payments to NCLC for rent and utilities.

3. A copy of the rental agreement between USLP and its leasor.

4. Records of expenditures made on behalf of the LaRouche Presidential Campaign, including but not limited to all television shows on which Mr. LaRouche appeared, and all expenditures to Campaigner Publications and New Solidarity International Press Service. This should include copies of invoices between USLP and all vendors which USLP used on behalf of the LaRouche Presidential Campaign.

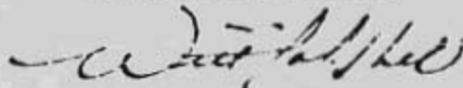
5. Records of all loan agreements with commercial establishments and documentation of the security on which these loans were based.

Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This investigation shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this case is Biz Van Gelder (telephone no. 202/523-4175). For your information, the Commission plans to consolidate its investigations herein with the one being conducted in MUR 368 (you were notified of this investigation under separate cover).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

May 13, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Caucus of Labor Committees
Lyndon LaRouche, Chairman
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe the National Caucus of Labor Committees (NCLC) has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. A summary of the provisions at issue and the evidence involved in the violations is as follows:

(1) Reports filed by the Committee to Elect Lyndon LaRouche (CTEL) indicate that during 1976 NCLC made \$6,250 in in-kind contributions to CTEL. In addition NCLC rented office space to CTEL for which, according to CTEL records, there is an outstanding debt in excess of \$35,030.27. Finally, it appears that a number of NCLC members have worked on behalf of the LaRouche Campaign. This evidence appears to indicate that NCLC is a political committee within the meaning of 2 U.S.C. §431(d). Accordingly, the Commission has found reason to believe that NCLC is in violation of the registration and reporting requirements set forth in 2 U.S.C. §§433 and 434.

(2) Our analysis of reports filed by the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche, (CTEL) indicates that each group has accumulated a substantial debt to your committee without any significant repayment. The steady accumulation of these debts may be viewed as contributions-in-kind to USLP and CTEL and as such gives the Commission reason to believe that violations of the limitations contained in 2 U.S.C. 441a(1) (A), have been committed.



(3) The personnel overlap between USLP, NCLC, and CTEL, in addition to common addresses, similar patterns of contributions, possibly interconnected expenditure patterns, and substantial transfers of funds among the groups appears to indicate that USLP, CTEL and NCLC are all affiliated committees. Accordingly, there is reason to believe that the groups are in violation of 2 U.S.C 433(b)(2) for failing to report such affiliation.

Under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission, we request that the following materials be made available:

1. All records reflecting an agreement or agreements between NCLC and USLP in force from 1976 to the present for the provision of office space and services in connection therewith.
2. The agreement or agreements between NCLC and any other party of parties from whom it leases office space.
3. Records of all loan agreements made by NCLC with USLP and CTEL involving monies used in connection with a federal election, particularly as reflected in the campaign reports of the latter two groups.
4. Records of all debts owed to NCLC by CTEL and amounts paid by CTEL in connection therewith. Records of deposits of monies received from CTEL in connection with said debts.
5. Records of all debts owed to NCLC by CTEL and amounts paid by CTEL in connection therewith. Records of deposits of monies received from NCLC in connection with said debts.

In addition we would appreciate if you would respond to the following items:

1. USLP set forth a number of entries in schedule A of reports listing your organization as the donor without any description of the services (see attached pages). For each entry please describe: (a) the explicit services underlying the entry; (b) the person or persons involved in these services. Please supply any records which document the information in your answer.

2. CTEL sets forth several entries in its campaign reports bearing the notation "contribution-in-kind" and listing your organization as the donor. (See attached pages). For each entry please describe: (a) the explicit services underlying the contribution-in-kind; (b) person or persons involved in these services. Please supply any records which document the information in your answer.

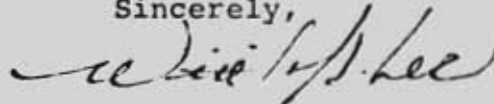
Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of receipt of this letter.

Where possible please submit answers to the preceding two questions under oath by person having personal knowledge of the information alleged. This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public.

If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", written in a cursive style.

William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The Committee to Elect Lyndon LaRouche,
The National Caucus of Labor Committees,
Campaigner Publications, New Solidarity
International Press Service, and the
U. S. Labor Party

MURS 281, 328, 368,
and 398

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission,
do hereby certify that on May 11, 1977, the Commission determined by a
vote of 5-0 to take the following actions:

- 1) To Find Reason to Believe that the National Caucus of Labor Committees (NCLC) has violated:
 - (a) 2 U.S.C. Section 434 by failing to register and report with the Commission.
 - (b) 2 U.S.C. Section 441a by making excessive contributions in-kind to CTCL and USLP.
 - (c) 2 U.S.C. Section 433 (b) (2) by not registering as an affiliated committee with USLP and CTCL.
- 2) To Find Reason to Believe that New Solidarity International Press Service has violated:
 - (a) 2 U.S.C. Section 441b by making illegal corporate contributions in-kind to USLP, CTCL and NCLC on behalf of the LaRouche presidential campaign.
- 3) To Find Reason to Believe that Campaigner Publications has violated:
 - (a) 2 U.S.C. Section 441b by making illegal corporate contributions in-kind to USLP, CTCL and NCLC on behalf of the LaRouche presidential campaign.

4) To Find Reason to Believe that the Committee to Elect Lyndon LaRouche has violated:

(a) 26 U.S.C. Section 9042 by making false and misleading statements in reports for certifications and on audit reports.

(b) 2 U.S. C. Section 433 (b) (2) by failing to report affiliation with USLP and NCLC.

5) To Find Reason to Believe that the U. S. Labor Party has violated:

(a) 2 U.S.C. Section 433 (b) (2) by not reporting its affiliation with CTCL and NCLC.

that the further investigation of the activities of CTCL, USLP, NCLC, New Solidarity and Campaigner Publications be continued as recommended by the General Counsel in the report dated May 9,

that the letters submitted by the Office of the General Counsel be sent and that the respondents be asked to submit the financial reports recommended by the FEC Office of the General Counsel.

Commissioner Tiernan was not present at the time of the vote.

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

EX-101-1000

THE FEDERAL ELECTION COMMISSION

In the Matter of May 9, 1977)
The Commission to Elect Lyndon LaRouche,)
The National Caucus of Labor Committees,) MURs 281, 328, 368
Campaigner Publications, New Solidarity) and 398
International Press Service, and the)
U. S. Labor Party)

INTERIM INVESTIGATIVE REPORT

I. Summary

The Commission currently has three matters under review which concern the presidential campaign of Lyndon LaRouche (MURs 281, 328, and 368), and has in addition conducted an audit of Mr. LaRouche's principal campaign committee (CTEL) in conjunction with his request for presidential primary matching funds. The recommendations set forth herein result from staff analysis of information generated in conjunction with these matters and have been grouped under the case designation, MUR 398 (77). These recommendations supplement those already made for the Committee to Elect Lyndon LaRouche and the United States Labor Party in MURs 281, 328, and 368.

II. Facts and Prior Proceedings

A. Parties Involved.

Our analysis indicates that five named organizations bore the brunt of collecting contributions, making expenditures and supplying services on behalf of Lyndon LaRouche's 1976 Presidential Campaign. The organizations -- each of which are

named as a subject of the investigation herein -- are as follows: The National Caucus of Labor Committees (hereafter, NCLC); the United States Labor Party (hereafter, USLP); the Committee to Elect Lyndon LaRouche (hereafter, CTCL); New Solidarity International Press Service (hereafter, New Solidarity); and Campaigner Publications.

The NCLC, a non reporting entity, appears to be the umbrella organization for the other four groups. It was founded in 1967 by Mr. LaRouche, who is currently its Chairman. Shortly after, Mr. LaRouche formed the electoral arm of the organization, USLP. This group, registered with the Commission as a political committee in October, 1975, and has been filing campaign reports since that time. Accordingly to a letter received from its counsel in October, 1976, USLP has set up a large number of state groups, some of which have also filed reports with the Commission. The USLP unanimously nominated Mr. LaRouche as its presidential candidate on October 16, 1976, after Mr. LaRouche received the support of the U. S. Labor Party Caucus in each of 30 states.

CTCL, also a reporting entity, is the principal campaign committee of the LaRouche Presidential Campaign.

NCLC members incorporated New Solidarity International Press Service and Campaigner Publications in New York in 1974. The former corporation is apparently the "intelligence" arm

of NCLC since USLP and CTCL reports list expenditures to it for "research and legislation." The latter corporation publishes The Campaigner magazine, a monthly publication, and New Solidarity, a biweekly paper which is published in six languages. Both publications present themselves in their publications as the "voices" of NCLC and USLP.

A chart outlining the relationship of NCLC, CTCL, USLP, New Solidarity, and Campaigner Publications is appended hereto as Exhibit 1 A. Also appended as Exhibit 1 B is a chart setting forth personnel relationships between NCLC, USLP, CTCL, New Solidarity, and Campaigner Publications.

B. Prior Proceedings

(1) MURs

Exclusive of the apparent violations noted in Part IV, Section A of this report, there have been three MURs involving the LaRouche Presidential Campaign in which the Commission has found reason to believe that violations of the federal election statutes were committed.

In MUR 281 (77) the Commission found reason to believe the CTCL had violated 2 U.S.C. §434(b) because of its failure to disclose in its reports the names and addresses and the occupation and principal place of business of contributors. Subsequently, a list of names and addresses was furnished, as part of the request for presidential primary matching funds by Mr. LaRouche. However, a staff review of the request raised a number of factual issues as

to the veracity of the information set forth therein. Accordingly, in a separate MUR (#368), the Commission found reason to believe the CTEL had violated 2 U.S.C. §441(f) and 26 U.S.C. §9042(d). Finally, in MUR 328 the Commission found reason to believe that CTEL had committed an additional violation of §434 because of its failure to indicate the source of a \$90,000 expenditure for an election eve broadcast by Mr. LaRouche. Although the expenditure was subsequently reported by the U.S. Labor Party, the accuracy of the reports is still questionable (see, infra.).

(2) Request for Presidential Primary Matching Funds.

On October 14, 1976, Mr. LaRouche submitted a request to the Commission seeking presidential primary matching funds.

On November 4, 1976, the Commission approved, pursuant to the provisions of 2 U.S.C. §438(a)(8), a matching fund threshold audit of CTEL.

The audit reviewed expenditure and contribution records of CTEL for the period September 1, 1975 to October 18, 1976. As indicated in a memorandum to the Commission, dated December 27, 1976, the staff found that the bulk of the contributions to CTEL (57%) was received in the last two weeks of eligibility, with NCLC volunteer contributions accounting for a significant portion of the monies received (16%). In many cases, the contributor's listed occupation

seemed unusual for the amount donated. Many contributions were in cash. (The Memorandum to the Commission is appended as Exhibit 2). As for expenditures and debts of CTEL, many of these could not be verified from the records supplied.

On January 14, 1977 the Commission approved the direct contacting of contributors to verify contributions in three states: Delaware, Massachusetts, and Wisconsin. The contacts indicated that a substantial number of contributions could not be verified, either because the contributor could not be located at the address listed, refused to be interviewed, or denied making all or part of the donation. Moreover, in one instance a contributor indicated that the contribution had not been made out of his own funds (a report summarizing the findings of the contributor contacts was sent to the Commission on February 10, 1977; it is appended hereto as Exhibit 3).

A request to examine the records of NCLC, USLP, New Solidarity and Campaigner Publications as part of the examination of CTEL's submission for matching funds on the ground that they were affiliated organizations was rejected by CTEL by letter dated January 26, 1977 on the ground that the organizations were independent.

On February 10, 1977 the Commission unanimously determined that Mr. LaRouche had not satisfied the provisions of 26 U.S.C. §§9033(b)(3) and (4) and should therefore be denied matching funds.

Thereafter CTCL, USLP, Lyndon LaRouche, and LeRoy Jones (an official of the USLP) filed suit in the U. S. Court of Appeals for the District of Columbia (CA No. 77-1184) disputing the Commission's determination that CTCL is ineligible for matching funds. That suit is presently pending. Also pending is a class action filed by the USLP and other related plaintiffs alleging, in essence, that the Commission's staff in attempting to verify contributions in Delaware, Massachusetts, and Wisconsin violated the rights of the persons contacted.

III. Apparent Violations Committed by Respondents.

A. Overview.

The apparent infractions committed by respondents fall into two general categories.

The first and most substantial category consists of matters which follow or can be inferred from the financial information and other data actually reported by USLP and CTCL. These include possible illegal in-kind contributions to LaRouche by New Solidarity and Campaigner Publications; possible affiliation of USLP, NCLC, and CTCL; failure of NCLC to register and report as a political committee.

The second group of violations involves the possibility that CTCL and USLP have knowingly reported or facilitated the reporting of false information. These include possible violations of 2 U.S.C. §441(f) and 26 U.S.C. §59042(c) and (d) by both groups.

We herewith set forth a description of the particular violations committed by each of the named respondents. These violations as already noted, are in addition to those already set forth in MURs 281, 328, and 368. A description of our proposals for further investigation of this matter is set forth in Section IV, Part B.

B. Particular Violations Apparently Committed by Respondents.

1. NCLC:

2 U.S.C. 431(d) defines a "political committee" to mean any committee, club, association, or other group of persons which receive contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal Election.

The various reports of CTCL list a total of \$6,250 in in-kind contributions from NCLC, with no further explanation as to what the in-kind contributions were for. In addition, NCLC volunteers supplied 16% of the total contributions listed in the LaRouche Presidential Primary matching fund submission. Finally, NCLC rents office space to CTCL for which there is an outstanding debt of \$35,030.27, as of to date. This debt has been accumulating for six months and, if not subject to repayment procedures in the ordinary course of business, may be a contribution in-kind. It would therefore appear that NCLC is a "political committee" within the meaning of §431(d) and is subject to the registration and reporting requirements of 2 U.S.C. §§433, and 434. In fact, NCLC has filed no report with the Commission.

It also seems clear that NCLC does not fulfill the statutory definition of "multicandidate committee" since it has not registered at the Commission as such for 6 months. (See 2 U.S.C. §441a(a)(4)). Therefore NCLC is precluded from making any contributions to a candidate's political committee (in this case CTCL) in excess of \$1,000. As already noted, it appears that NCLC's contributions to the LaRouche Campaign have exceeded this amount.

Although we do not have a copy of the rental agreement between USLP and NCLC, the USLP lists a monthly rental obligation to NCLC of \$8,990 a month. In its year end report, the USLP lists this obligation as an outstanding debt since February, 1976. In fact, USLP has tendered only \$7,150, (less than one month's rent) to NCLC in satisfaction of a \$98,890 amount owed. This leaves an obligation of \$91, 640 outstanding as the close of calendar year 1976. The steady accumulation of the USLP debt to NCLC and its nonpayment suggests that it, like the CTCL debt to NCLC, may be a contribution in-kind and, as such, a violation of the limitations in 2 U.S.C. §441a(1)(A).

2. USLP:

The United States Labor Party, NCLC, and CTCL all share the same office space at 231 W. 29th Street, N.Y., N.Y. 1001. All three groups appear to have many common officers and substantial personnel overlaps. These overlaps are

described in Exhibit 1B. Among the most significant are Lyndon LaRouche, who is candidate and chairman of USLP, chairman of NCLC, and the presidential candidate of CTCL; Richard Welsh, who is treasurer of both USLP and CTCL; and Stephen Pepper, who is financial consultant to CTCL, a member of the convention committee of USLP, and controller of Campaigner Publications.

It should also be noted in this connection that respondents themselves have referred to USLP and NCLC as interchangeable entities. In a memorandum to law submitted to the U.S. District Court for the Eastern District of Michigan, it is stated:

"Each plaintiff (e.g., in the law suit) is a member of a socialist political organization referred to herein as the United States Labor Party ("USLP") and also known as the National Caucus of Labor Committees ("NCLC").

At the time of the November 1976 audit of CTCL to determine whether the group was entitled to Presidential Primary Matching Funds, CTCL had made 40% of its total expenditures to USLP and NCLC. In addition a substantial portion of the remainder of CTCL's expenditures were to New Solidarity and Campaigner, two other groups, which, as indicated earlier, may be intertwined with the NCLC and the United States Labor Party. Finally, as already noted, a substantial number of contributions to CTCL were made by

persons who are described as volunteers for NCLC. CTEL also reports repaying individuals who made loans to USLP.

The evidence heretofore adduced indicates there is reason to believe NCLC, USLP, and CTEL are affiliated political committees. As such they have failed to report the affiliation as required by 2 U.S.C. §433(b)(2).

It should be noted in this connection that on the basis of letters and submissions received from USLP and CTEL, it is not unlikely that the USLP will assert that it is the national committee of a political party and is therefore entitled to the exemption of 2 U.S.C. §441a(d), covering contributions and expenditures by the "national committee of a political party." Whether NCLC could possibly make the same claim is unclear.

3. New Solidarity:

Our review of publications by New Solidarity indicates that its primary purpose in 1976 was to do research and prepare position papers for the U.S. Labor Party and CTEL. A review of the reports of USLP for 1976 discloses that New Solidarity billed USLP for \$9,600 of services during 1976, and collected only \$976, leaving an outstanding debt at the end of the calendar year of \$8,624.

Similarly, New Solidarity billed CTEL for services valued at \$25,050, and received payment for \$4,309, thus leaving a balance of \$20,741 uncollected. As in the case of the CTEL and USLP debts to NCLC, there is a possibility that the debts

owed to New Solidarity are in fact contributions. If this is true, New Solidarity would have violated 2 U.S.C. §441b(a) since it is a corporation. A §441a violation would be involved if the group is incorporated.

4. Campaigner Publications:

Campaigner Publications appears to be responsible for advertising, video tape production and printing. Its two publications, as already noted, are The Campaigner and New Solidarity. Both publications have as sole clients CTEL and USLP.

The year end reports of the USLP from August 1, 1976, through December 31, 1976, indicate that the USLP purchased services from Campaigner Publications worth 59,032.62. During that same period, the USLP made payments amounting only to 7,979.22 thus leaving an outstanding debt for the last half of 1976 of \$51,062.40. Campaigner's billings to CTEL during the same period were listed as \$50,318.92, while Campaigner received only \$15,584.05 in satisfaction. Therefore \$35,050 remains as a debt.

Again, the heavy accumulation of debt over a substantial period of time and the apparent lack of an attempt to discharge it, indicates reason to believe the debts may in fact be contributions, and, if that, would violate §441b (Campaigner Publications is incorporated). A §441a violation may be involved if the group is unincorporated.

5. CTEL:

In MUR 368 the Commission adopted a staff

recommendation indicating, inter alia, that there was reason to believe CTCL had violated 2 U.S.C. §441 f and 28 U.S.C. §9042(d)(i) by accepting contributions made in the name of another. It would also appear, based on our continued analysis of the information involved in that MUR, that there is reason to believe CTCL has violated 28 U.S.C. §9042 (c)(1) by furnishing false information to the Commission during its audit in connection with the group's request to the commission for presidential primary matching funds.

IV. Recommendations

A. Findings of Reason to Believe (MUR 398)

The Office of General Counsel recommends that the Commission find reason to believe that the following violations have been committed:

- (1) National Caucus of Labor Committees (NCLC) has violated:
 - (a) 2 U.S.C. §434 by failing to register and report with the Commission.
 - (b) 2 U.S.C. §441a by making excessive contributions in-kind to CTCL and USLP.
 - (c) 2 U.S.C. §433(b)(2) by not registering as an affiliated committee with USLP and CTCL.
- (2) New Solidarity International Press Service has violated:
 - (a) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTCL and NCLC on behalf of the LaRouche presidential campaign.

(3) Campaigner Publications has violated:

- (a) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTEL and NCLC on behalf of the LaRouche presidential campaign.

(4) Committee to Elect Lyndon LaRouche has violated:

- (a) 26 U.S.C. §9042 by making false and misleading statements in reports for certifications and on audit reports.

- (b) 2 U.S.C. §433 (b)(2) by failing to report affiliation with USLP and NCLC.

(5) U.S. Labor Party has violated:

- (a) 2 U.S.C. §433 (b)(2) by not reporting its affiliation with CTEL and NCLC.

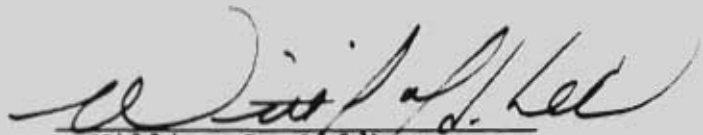
B. Further Investigation

Our analysis of the activities of CTEL, USLP, NCLC, New Solidarity and Campaigner Publications suggests the need for further investigation of these groups to resolve the factual issues arising from the apparent coordination of their activities with the LaRouche Presidential Campaign. The investigation would focus on records of all expenditures made or services furnished by the groups in question to the LaRouche campaign. This would include, but not necessarily be limited, to billings, contractual arrangements (such as rental agreements), records of payments received from CTEL, records of deposits of said payments, concrete proof of services provided to CTEL. The investigation would probably require the presence of at least two auditors.

At a subsequent time we anticipate that it will be necessary to depose certain of the key personnel and contributors who were involved in the LaRouche campaign.

We recommend as an initial step that each of the groups named herein be sent the attached letters advising them of the documents and information required by the Commission. The letters also contain notice of the reason to believe findings recommended in Part A. If the documents and information are not produced, we will forthwith recommend that production be secured through compulsory process.

5/9/77
Date


William C. Oldaker
General Counsel

Lyndon LaRouche for President

Wayne Evans for Vice President

cc # 1300

77 FEB 24

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001
Telephone: (212) 563-8600
Marcia Merry, Chairman
Richard Welsh, Treasurer

William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street NW
Washington, DC 20463

770619

February 22, 1977

Dear Mr. Oldaker,

In reference to your February 10 letter (MUR 328 (76)):

The \$90,000 expenditure to National Broadcasting Company you refer to is fully accounted for in the U.S. Labor Party post-election report for 1976. The advertisement was sponsored by the U.S. Labor Party.

Sincerely,

Marcia Merry Pepper
Marcia Merry Pepper

MMF: lh

Vote U.S. Labor Party 1976

GEO BOX 20463
FEDERAL ELECTION COMMISSION
ARTHUR ROYSE



POST OFFICE 24 11 13:13

William C. Oldaker
FEDERAL ELECTION COMMISSION
1325 K St. NW
Washington, DC 20463

REGISTERED

388329

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

HAND DELIVERED

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed
Committee to Elect Lyndon LaRouche

2 Identification Number
c00031781

(b) Address (number and street)
P.O. Box 1972, G.P.O.

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☐ No

(c) City, State and ZIP code
New York, N.Y. 10001

(b) If "Yes," for which election?
_____ on _____ (date)
(general, primary, runoff)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For _____ (Which report?)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report

(e) ☐ January 31 Year End Report

(f) ☐ Monthly Report _____ (Month)

(b) ☐ April 10 Quarterly Report

(h) ☒ Tenth day report preceding General election on 11/2/76 in the State of United States
(primary, general or convention) (state)

(g) ☐ Termination Report

(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____
(primary, general or convention) (state)

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period From 10/1/76 Through 10/15/76

Section A - Cash Balance Summary

Column A
This Period

Column B
Calendar Year To Date

6 Cash on hand January 1, 1976

\$ 774.35

7 Cash on hand at beginning of reporting period

\$ 6,140.41

8 Total receipts (from line 19)

\$ 55,102.03

\$ 126,535.35

(a) Subtotal (Add lines 7 and 8)

\$ 61,242.49

\$ 127,339.73

9 Total expenditures (From line 25)

\$ 15,912.52

\$ 122,003.75

10 Cash on hand at close of reporting period (Subtract line 9 from line 8)

\$ 5,329.97

\$ 5,329.97

11 Cash on hand items on hand to be liquidated (attach itemized list)

\$

**Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)**

12 Operating expenditures (from line 20)

\$ 55,613.12

\$ 116,547.13

13 Refund and Reserves (from line 17)

\$

\$

14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)

\$ 55,613.12

\$ 116,547.13

(b) Expenditures from prior years subject to limitation

\$ 4,315.41

(c) Total expenditures subject to limitation (Add lines 14a and 14b)

\$ 120,862.59

I certify that I have examined this Report and the books, records, and documents of the candidate or committee and find it true and correct.

(Typed name of Treasurer of Candidate)

(Signature of Treasurer of Candidate)

Oct 28, 1976
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g or 443. (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be required for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

76930373

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD FROM: TO:	
	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other income:		
(a) Itemized (use Schedule A)	\$ 55,102.08	
(b) Unitemized	\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (S.)		
(d) Subtotal of contributions and other income	\$ 55,102.08	\$ 126,565.35
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$ 55,102.08	\$ 126,565.35
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$ 55,016.12	
(b) Unitemized	\$ 602.00	
(c) Subtotal of operating expenditures	\$ 55,618.12	\$ 116,547.18
21 Independent Expenditures (use Schedule B)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ 294.40	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 294.40	\$ 344.40
23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (itemize on Schedule B Regardless of Amount)	\$	
(c) Subtotal of transfers out	\$	\$ 5,118.18
25 Total Expenditures	\$ 55,912.52	\$ 122,009.76
PART III - DEBTS AND COLLECTIONS		
26 Debts and obligations owed to the Committee (itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (itemize all on Schedule C)	\$ 127,941.05	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$ 55,102.08	
29 Transfers In (from line 18(c))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$ 55,102.08	
31 Total Expenditures (from line 25)	\$ 55,412.52	
32 Transfers Out (from line 24(c))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$ 55,412.52	

76030371257

O.P.I.

11-2-76

913

UP-109

(POLITICS)

WASHINGTON (UPI) — THE FCC RULED TODAY THE NATIONAL BROADCASTING CO. MUST SELL EQUAL TIME TO THE U.S. LABOR PARTY PRESIDENTIAL CANDIDATE BECAUSE THE NETWORK IS ALLOWING REPUBLICANS AND DEMOCRATS TO BUY AIR TIME.

BOTH PRESIDENT FORD AND JIMMY CARTER PURCHASED NATIONWIDE ADVERTISEMENTS ON NBC, AS WELL AS CBS AND ABC TELEVISION.

THE LABOR PARTY ASKED NBC TO SELL AT TIME THIS EVENING TO ALLOW ITS CANDIDATE, LYNDON LAROUCHE, TO MAKE AN APPEAL FOR VOTES. IT COMPLAINED TO THE COMMISSION WHEN NBC DECLINED TO SELL IT TIME.

A COMMISSION SPOKESMAN SAID THE 5-0 DECISION WAS THE FIRST TIME SUCH AN ACTION HAD BEEN TAKEN BY THE FCC ON THE NIGHT BEFORE A PRESIDENTIAL ELECTION. NBC SAID IT WOULD COMPLY WITH THE RULING ON THE POLITICAL ADVERTISEMENT, WHICH COSTS \$96,000.

THE LABOR PARTY HAD ASKED LAST FRIDAY TO BUY THE TIME AND WAS TOLD SUNDAY NONE WOULD BE AVAILABLE BECAUSE OF THE LATE REQUEST.

MILTON GROSS, CHIEF OF THE FCC FAIRNESS-POLITICAL BROADCASTING BRANCH SAID: "FORD AND CARTER GOT A HALF HOUR OF NETWORK TIME AND LAROUCHE, IF HE IS A QUALIFIED CANDIDATE, IS ENTITLED TO HIS HALF HOUR."

LAROUCHE SAID THE AD WAS INTENDED TO SHOW "THE PARTY PLATFORM, AND TO PRESENT OUR VIEW ON THE ROLE OF CARTER AND WHAT THE SIGNIFICANCE OF A 7 TO 10 MILLION VOTER TURNOUT FOR THE LABOR PARTY WHICH IS OUR GOAL."

LAROUCHE SAID THE PROGRAM WAS TAPED EARLIER TODAY AT A PRIVATE STUDIO.

-0-

LOS ANGELES TIMES

THE TOP OF A

Washington Post 11-2-76

Ford Unit Reprints An Anti-Carter Ad

The President Ford Committee has spent slightly more than \$100,000 to place an unusual anti-Carter advertisement in some 40 big city dailies in recent days, a spokesman said yesterday.

The anti-Carter ad was originally placed in a California newspaper by Herbert Haff, former California state finance chairman for the Carter campaign.

He it, Haff said, he felt it was his duty to explain publicly his view that Carter is not qualified to be President. Carter aides have blamed Haff's motivation on personal factors.

Haff's original advertisement is being reprinted at the expense of citizens who wanted to do so, and the President Ford Committee took up others. The ad has appeared in the New York Times, New York Daily News, Cleveland Plain Dealer, St. Louis Globe-Democrat, Los Angeles Times and 33 other papers.

FEDERAL ELECTION COMMISSION

Commissioner Objection Sheet
Inter office memo.

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed, Les G. Lewis

date 11-29-80

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Inter office memos - not sent
to Commission, routing slips

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Lois G. Lerner

date

4-29-82

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Conciliation material
routing slips. Extra-
memo to file sheet:
bank account numbers

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input checked="" type="checkbox"/> (3) Exempted by other statute | <input checked="" type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed B. J. Linn
 date 11-29-82

FEC 9-21-77

ACC#402

JOEL D. JOSEPH
ATTORNEY AT LAW
SUITE 1010
1712 EYE STREET, N.W.
WASHINGTON, D.C. 20006

(202) 338-8560
(202) 338-8492

77 MAY 9 AM 10:34
FEDERAL ELECTION COMMISSION

May 5, 1977

771438

Biz Van Gelder
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Biz,

This letter is in response to MUR 368. We wish that this investigation be made public.

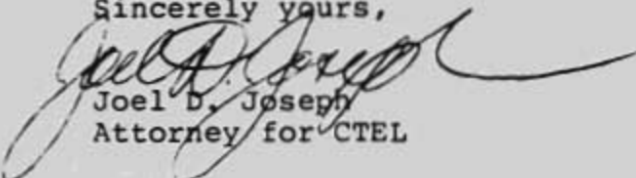
The "individual verification" process described in your letter is not authorized by law and is unconstitutional. See Civil Action No. 77-0732, D.D.C., filed last week.

Besides the illegal nature of the "verification" process the so-called verification is unreliable. The individual contributors were in great fear when interrogated and admit that their responses were not always accurate. See paragraph 37 of the complaint in CA 77-0732.

The Committee to Elect LaRouche did not knowingly accept contributions in the name of another. The Commission has produced no evidence of "knowing acceptance." Even if the contributions were made in the name of another, which we dispute, the Committee to Elect LaRouche had no knowledge of this.

We consider this MUR to be unreasonable harassment. Please advise me that this MUR has been dismissed.

Sincerely yours,


Joel D. Joseph
Attorney for CTCL

3
7
8
JOEL D. JOSEPH

ATTORNEY AT LAW

SUITE 1010

1712 EYE STREET, N. W.

WASHINGTON, D. C. 20006

FEDERAL ELECTION
COMMISSION

'77 MAY 9 AM 10:30



Biz Van Gelder
Federal Election Commission
1325 K St., N.W.
D.C. 20463



File

FEDERAL ELECTION COMMISSION

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

April 19, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. Donald York
403 Dickerson Hall C
Newark, Delaware 19711

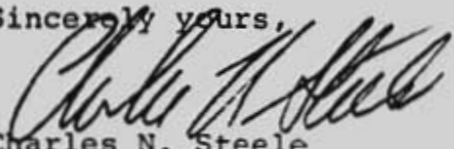
Re: MUR 368

Dear Mr. York:

On January 26, 1976, you met with our investigators, Keith Vance and Charles Hanshaw to discuss your contributions to the Committee to Elect Lyndon La Rouché. We appreciate your cooperation in this matter and would now like to depose you concerning certain matters which you discussed with our investigators. This deposition will be arranged at a time and a place convenient to you. In this connection you may wish to contact a lawyer.

We would like to conduct the deposition as soon as possible and will contact you to arrange a convenient time and date. The attorney assigned to this case is Biz Van Gelder (phone no. 800/424-9530).

Sincerely yours,


Charles N. Steele
Associate General Counsel

Van Gelder/caw/4/19/77



ACC # 158

FILED

STATE OF NEW JERSEY

:
: SS.

APR 23 1976

County of HUDSON :

[Signature]
NOTARY PUBLIC

I, DAVID L. JONES, JR., do solemnly swear
(or affirm) that I will support the Constitution of the United States
and the Constitution of the State of New Jersey; that I will bear true
faith and allegiance to the same and to the Governments established
in the United States and in this State, under the authority of the people;
and that I will faithfully, impartially and justly perform all the duties
of the office of MEMBER HOUSE OF REPRESENTATIVES

according to the best of my ability. (So help me God).*

Sworn and subscribed to
before me this 28th day of
APRIL A. D. 1976.

[Signature]

[Signature]

ADDISON M. McLEON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Nov. 12, 1978

*Person taking oath has the option of including "So help me God", if he
so desires.

IMPORTANT:

TOTAL NUMBER OF SIGNATURES ON PETITION 225

The Name, Address and Designation of the Candidate on this petition must be printed or typed. If not complied with, petition will be returned to be properly filled out.

The information given in this petition as to the above is used in certifying to the County Clerk.

PLEASE PRINT OR TYPE NAME OF CANDIDATE

PETITION OF NOMINATION FOR GENERAL ELECTION NOVEMBER 2, 1976

PETITION FOR HOUSE OF REPRESENTATIVES

Signatures Required 100

To The Honorable Secretary of State:

Each signer of this petition certifies that the following statements are true:

1) I reside in the State of New Jersey in the 14th Congressional District; 2) I am legally qualified to vote for such candidate; 3) I pledge myself to support and vote for the person named in this petition for the office of House of Representatives; 4) I have not signed any other petition for the primary or general election for House of Representatives; 5) I request that you cause to be printed upon the official general election ballot the name of the candidate and his designation of party or party principle;

BRING US TOGETHER

(Must not exceed three words and must be in accord with R.S.19:13-4)

Name of Candidate

Number, Street or Avenue

City

Zip Code

DAVID L. JONES, JR. 44 ORIENT AVE., Jersey City N.J.
(PLEASE PRINT OR TYPE)

07305

SIGNATURE SHEET

6) Signature and address must be written (not printed) in the signer's own handwriting;

Name	Number, Street or Avenue	City
1 Robert H Urale	118 Grant Ave	Jersey City, N.J.
2 Veronica Pettiford	730 Newark Ave	Jersey City, N.J.
3 Terrell Jones	107 Jackson Ave	J.C. N.J.
4 Sara V. Sique	86 Clendenney	J.C. N.J.
5 Candice Farris	27 Clinton Avenue	Jersey City, N.J. 07304
6 Cynthia Sheppard	116 Bergen Ave.	Jersey City N.J. 07305
7 Daisy Washington	201 Jackson Ave	Jersey City, N.J.
8 Willie Ray	11 West 40th St.	Providence, R.I.
9 John S. Wright	65 Atlantic St.	Jersey City, N.J.
10 John S. Wright	371 Brunswick Ave	Jersey City, N.J.
11 Lorraine Sullivan	18 2nd Street	Jersey City, N.J.
12 Ethel Long	42 Randolph Ave	Jersey City N.J.
13 Rosetta Pinkney Rutledge	18 Bayside Dr.	Jersey City, N.J. 07305
14	46 Th... St.	N.J.
15 Rosi H. H. H.	571 Th... St.	J.C. N.J. 07302
16 J. L. Wilk	56 Randolph Ave.	J.C., N.J. 07305
17 Joe and Yolanda	500 Brunswick Ave	J.C. N.J. 07304
18 Robin Wright	321 Th... St.	Jersey City, N.J. 07304
19 Annette Lee	55th Marchman Ave	Jersey City, N.J. 0730
20 Glenn Brown	130 Wade St	Jersey City, N.J. 073

SIGNATURE SHEET

Signature and address must be written (not printed) in the signer's own handwriting:

	NAME	Number and Street	City
21	Ellie Mallard	223 Claremont Ave.	J.C. N.J.
22	Monetta Indalata	517 Garden St.	Hoboken, N.J. 07030
23	Antonia Paz	255 Bannock St.	J.C. N.J.
24	Robert D. ...	290 Palmona Pk. Rd.	J.C. N.J. 07307
25	Ruby Johnson	212 Bidwell Ave	Jersey City, N.J. 07305
26	Carl Robinson	5901 Blvd East	West New York, N.J. 07093
27	David J. ...	14 Ford Ave	Bayonne, N.J. 07007
28	Brenda Harris	73 Clark St	Jersey City, N.J.
29	Steven R. Jekim	148 Bayview Ave	Jersey City, N.J.
30	Paul F. Fulford	2600 Kennedy Blvd	Springfield, N.J.
31	Robert V. ...	45 Creative Ave.	Jersey City, N.J.
32	Frances Appella	47 ... St.	Jersey City, N.J.
33	Grace K. ...	336 ... Ave.	Jersey City, N.J.
34	Nydia Roman	377 1st St	Jersey City, N.J.
35	Hilda ...	355 York St	Jersey City, N.J.
36	Macon Fitchford	225 St. Pauls Ave	J.C., N.J. 07300
37	Richard D. ...	2040 Kennedy Blvd (N.J.)	07305
38	Louella Cavalcanti	35 ... St.	J.C. N.J. 07306
39	William ...	144 ... Ave Jersey	City 07305
40	Elizabeth Campbell	1501 72nd St. North	Woodbridge, N.J.
41	Marcel Moon	96 Van Wagner	J.C. N.J.
42	Alfred H. Williams	176 Pine St	J.C. N.J.
43	John V. King Jr	144 ... Rd.	J.C. N.J.
44	Maria ...	420 ... Ave	J.C. N.J.
45	Michelle McQuilla	121 Bramhall Ave	J.C. N.J.
46	Joseph Montecarlo	94 ... Rd.	Jersey City, N.J.
47	John E. ...	118 ... St	Jersey City, N.J.
48	Norm ...	57 Park Street	Jersey City, N.J.
49	Esther Bell	105 Fulton Ave	Jersey City, N.J.
50	Elaine Walters	17 Upeland Terrace	Jersey City, N.J.
51	Carl J. Green	170 Cartwright Ave	Jersey City, N.J.
52	Maria ...	105 Fulton Ave	Jersey City, N.J.
53	Jacqueline Tilden	9 Hickman Drive	Jersey City, N.J.
54	John M. ...	483 ... Ave	J.C. N.J.
55	Jacqueline ...	41 Summit Ave.	J.C. N.J.
56	Marina Jones	75 ... Ave.	Jersey City, N.J.
57	William ...	111 ... Ave.	Jersey City, N.J.
58	Robert ...	13 Van ... Ave	Jersey City, N.J.
59	Elizabeth ...	2039 ... Blvd.	Jersey City, N.J.
60	William ...	21 Crescent Ave	Jersey City, N.J.

SIGNATURE SHEET

Signature and address must be written (not printed) in the signer's own handwriting:

NAME

Number and Street

City

61	Paula Kohn	15 Audubon Ave	J.C.N.J.
62	Patricia O'Neill	225 Union St.	J.C.N.J.
63	Frances F. Walton	91 Oak St	J.C.N.J.
64	Dorinda Brown	273 Wood St.	J.C.N.J.
65	Walter Harper	366 Bergen Ave	J.C.N.J.
66	Ulma Catalini	8 Canal St.	N.J. 07302
67	Francisco Guerrero	1300 Bloomfield Sp.	Hob. N.J. 07030
68	Nancy Miller	51 Marshall St	Jersey City, N.J.
69	Northey, John	1677 Kennedy Blvd	J.C.N.J.
70	Walter Harper	280 Hudson St.	J.C.N.J.
71	Sandra Little	1008 Montross St	J.C.N.J.
72	Magda Ferrer	266 Winfield Ave.	Jersey City, N.J.
73	Victoria Bratslav	366 Bergen Avenue	Jersey City, N.J.
74	Alta Cypeland	431 Jackson Ave	Jersey City, N.J.
75	Sam Brown	135 Clark Street	Jersey City, N.J.
76			
77			
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7) THIS SET OF SIGNATURES IS ONLY PART OF A PETITION.

A petition for House of Representatives must contain 100 signatures and although the signature sheets are solicited separately, the entire petition must be bound together before submitting to the Secretary of State.

The witness taking the affidavit below must be the person who obtained the names on this set of signatures or several sets of signatures. He must take the affidavit as witness for each set he solicits, but must sign only one signature sheet endorsing the candidate.

STATE OF NEW JERSEY,

COUNTY OF HUDSON ss.

VERA COPELAND, begin duly sworn, upon his oath saith that he is one of the signers
(Print Name of Witness)

of this petition; that such petition is signed by each of the signers thereof in his own proper handwriting; that each of such signers is, to the best knowledge and belief of deponent, a legal voter in the said State of New Jersey, as stated in said petition, and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person herein named in order to secure his nomination or selection as stated in said petition.

Subscribed and sworn to before me at

Jersey City, N.J.,

this 28th day of

APRIL, 1976

[Signature]

ADDISON M. Mc LEON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Nov. 12, 1978

Vera Copeland
(Signature of Witness)

431 Jackson Avenue
(Address of Witness)

JERSEY CITY
(City or Town) (Zip Code)

NEW JERSEY 07304

8) CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE

I, the undersigned, hereby certify I accept the nomination herein and that I am a resident of and a legal voter in the jurisdiction of the office for which the nomination is made:

[Signature]
(Signature of Candidate)

44 Orient Avenue
(Typewritten Name of Candidate)
(Street Address and City) (Zip Code)

Jersey City, New Jersey
07305

IMPORTANT:

TOTAL NUMBER OF SIGNATURES ON PETITION

The Name, Address and Designation of the Candidate on this petition must be printed or typed. If not complied with, petition will be returned to be properly filled out.

The information given in this petition as to the above is used in certifying to the County Clerk.

PLEASE PRINT OR TYPE NAME OF CANDIDATE

PETITION OF NOMINATION FOR GENERAL ELECTION

NOVEMBER 2, 1976

PETITION FOR HOUSE OF REPRESENTATIVES

Signatures Required 100

To The Honorable Secretary of State:

Each signer of this petition certifies that the following statements are true:

1) I reside in the State of New Jersey in the 14th Congressional District; 2) I am legally qualified to vote for such candidate; 3) I pledge myself to support and vote for the person named in this petition for the office of House of Representatives; 4) I have not signed any other petition for the primary or general election for House of Representatives; 5) I request that you cause to be printed upon the official general election ballot the name of the candidate and his designation of party or party principle;

BRING US TOGETHER

(Must not exceed three words and must be in accord with R.S.19:134)

Name of Candidate

Number, Street or Avenue

City

Zip Code

DAVID L. JONES, JR. 44 ORIENT AVE. Jersey City N.J. 07305

SIGNATURE SHEET

6) Signature and address must be written (not printed) in the signer's own handwriting.

Name	Number, Street or Avenue	City
David L. Jones Jr.	44 Orient Ave	J.C.
1. Robert L. Jones	128 Clark St	Jersey City, N.J.
2. Humphrey Pearson	90 Randolph Ave	Jersey City, N.J.
3. Christopher M. Bell	145 Van Nest Ave	Jersey City, N.J.
4. Robert H. Scheraga	118 Van Nest Ave	Jersey City, N.J.
5. Robert B. Smith	53 Kunkin Ave	Jersey City, N.J.
6. Ellen W. Wright	339 Arlington Ave	Jersey City, N.J.
7. Jimmy D. Dore	590 Brattman	N.J.C.
8. Bob S. Smith	232 Weyman Park	Jersey City, N.J.
9. Donald Rhodes	442 Bergen Ave	Jersey City, N.J.
10. Sandra E. Jones	157 Armstrong	J.C., N.J.
11. Robert Crawford	57 Baychester	J.C., N.J.
12. Emma M. Smith	195 Baldwin Ave	J.C., N.J.
13. Billy Wright	11 Hillside Ave	J.C., N.J. 07304
14. Richard L. Scheraga	131 Hillside Ave	J.C., N.J. 07306
15. Randy Brown	500A Ocean	J.C., N.J. 07305
16. William J. Dore	41 Stevens Ave	J.C., N.J. 07304
17. C. C. Smith	328 Forrest St	J.C., N.J. 07304
18. Bruce Evans	172 Armstrong	J.C. 07303
19. Margaret Hayes	274 Clement Ave	J.C. 07305
20. Jim B. Smith	17 Clinton Ave	J.C. 07304

Signature and address must be written (not printed) in the signer's own handwriting:

	NAME	Number and Street	City
21	Em. Chubb	103 Orient Ave	Jersey City
22	Harold J. Stalla	484 Bergen Ave	Jersey City
23	Ed. J. Brown	2 Bay St	Jersey City
24	Charles S. Chertus	33 MADISON AVENUE	JERSEY CITY, NJ
25	Cornelius D. Parker	37 Clinton Avenue	" "
26	Louaine Cuthbert	114 Armstrong Ave.	Jersey City
27	Marion L. Hughes	112 Standish Ave.	Jersey City, N.J.
28	Dr. L. E. Johnson	226 Duval St	Jersey City, N.J.
29	Thelma A. Fair	32 Astor Pl.	J.C. N.J.
30	Frank Jackson	119 Orient ave.	J.C.
31	Lillian Simpkins	118 Orient ave	J.C. N.J.
32	Charles R. Cook	217 Wilkinson Ave.	J.C. N.J.
33	Betty M. Knight	19 Clinton Avenue	J.C. N.J.
34	Barry Simmons	117 VAN Nostrand	J.C. N.J.
35	Thomas D. Fowler III	298 Bergen ave.	J.C. N.J.
36	Frederick Colman Jr.	455 Ocean Ave	J.C. N.J.
37	Frederick Brown	398 Ocean Ave.	J.C. N.J.
38	Frederick Brown	25 Condit St.	J.C. N.J. 07306
39	Frederick Brown	25 Condit St	J.C. N.J. 07306
40	Joe Brown	768 Ocean Ave	J.C. N.J.
41	Joe Brown	131 Wilkinson Ave	J.C. N.J.
42	Joe Brown	30 Randolph Ave	J.C. N.J.
43	John P. Calway	141 Myrtle Ave	Jersey City, N.J. 07305
44	William Smith	442 Bergen Ave	Jersey City, N.J. 07304
45	James Brown	510 Garfield Ave	Jersey City, N.J.
46	W. E. Alton	719 Garfield Ave	Jersey City, N.J.
47	W. E. Alton	99 Orient Ave	J.C. N.J.
48	Henry Harris	88 Orient Ave	J.C. N.J.
49	James D. Jackson	75 Jackson Ave	J.C. N.J.
50	W. E. Williams	98 Orient Ave	J.C. N.J.
51	J. T. Alton	85 Orient Ave	J.C. N.J.
52	W. E. Alton	163 Clearmont Ave	J.C. N.J.
53	W. E. Alton	337 Jackson Ave	J.C. N.J.
54	W. E. Alton	395 Fulton W	J.C. N.J.
55	W. E. Alton	36 Fisk St.	J.C. N.J.
56	W. E. Alton	207 Bayview Ave	J.C. N.J.
57	W. E. Alton	71 Kearney Ave	J.C. N.J.
58	W. E. Alton	42 Orient Ave	J.C. N.J.
59	W. E. Alton	41 Seiber St	J.C. N.J.
60	W. E. Alton	94 Orient Ave	J.C. N.J.
	W. E. Alton	26 Clinton Ave	J.C. N.J.

SIGNATURE SHEET

Signature and address must be written (not printed) in the signer's own handwriting:

	NAME	Number and Street	City
61	Charles Bennett	331 Jackson Ave	Jersey
62	Fleming Sted	156 Somerset Ave	Jersey
63	Anna Tania	127 Myrtle Ave	City
64	William J. Bell	238 William Ave	J.C.N.J.
65	Grace White	425 Rose Ave	J.C.N.J.
66	Anna Crowley	132 Boston	J.C.N.J.
67	S. Jones	132 Bayview Ave	J.C.N.J.
68	Bobie Bort	53 Randolph Ave	J.C.N.J.
69	Hath Jones	318 Jackson Ave	J.C.N.J.
70	Veronica Parker	226 Frederick Ave	J.C.N.J.
71	William J. Bell	67 Audubon Ave	J.C.N.J.
72	Robert Dett	55 Stegman St	J.C.N.J.
73	Deanne Mackey		
74	Larry Johnson	307 Forest St	J.C.N.J.
75	Michael Simpson	357 Jackson	J.C.N.J.
76	Dave Fagan	357 Jackson	J.C.N.J.
77	Margaret Eddy	114 Clement Ave	J.C.N.J.
78	Albert Plath	98 VAN NEST ROAD AVE	J.C.N.J.
79	William A. Couch	101 Tenet Ave	J.C.N.J.
80	Arthur Drenon	382 Forest St	J.C.N.J.
81	William H. Davis	150 Virginia Ave	J.C.N.J.
82	Clarence Bringle	163 Bostwick Ave	J.C.N.J.
83	K. Diddle	55 Clinton Ave	J.C.N.J.
84	W. H. Hanning	112A ORIENT AVE	J.C.N.J.
85	J. Matthews	287 Bergen Ave	J.C.N.J.
86	Ann Tucker	451 Bergen Ave	J.C.N.J.
87	Larry Brown	157 Bergen Ave	J.C.N.J.
88	Steve Pomeroy	105 Front Ave	J.C.N.J.
89	William M. M.	228 Dwight St	J.C.N.J.
90	E. L. W. H.	122 SEAVIEW AVE.	J.C.N.J.
91	Hannie G. Johnson	207 Bayview Ave	J.C.N.J.
92	William J. Bell	103 W. 1st Street	J.C.N.J.
93	J. D. Gray	71 Jivette Ave	J.C.N.J.
94	John Foster	82 Oak Drive	J.C.N.J.
95	Thomas Russell	242 Forest St	J.C.N.J.
96	Bernice Kelly	2128 Kennedy Blvd	J.C.N.J.
97	William B. B.	17 Brentwood St	J.C.N.J.
98	William B.	244 Jackson Ave	J.C.N.J.
99	E. Rudy York	460 FULTON A.	J.C.N.J.
100	Bernice M. M.	365 Jackson Ave	J.C.N.J.
	Anna Chama	163 Clement Ave	J.C.N.J.

7 1 3
SIGNATURE SHEET

Signature and Address Must be Written (Not Printed) in the Signers' Own Handwriting:

Name	Number, Street or Avenue	City
1-2 Charles Wise	191 Claremont Ave	Jersey City, N.J.
2-3 Elizabeth Collins	3 Madison Ave	Jersey City, N.J.
3-4 William Collins	44 Chest Ave	Jersey City, N.J.
4-5 Edwin Lady	178 Claremont Ave	Jersey City, N.J.
5-6 John Johnson	108 Wilburson Ave	Jersey City, N.J.
6-7 William Johnson	164 Grand Ave	Jersey City, N.J.
7-8 Richard Johnson	91 Van Nostrand Ave	Jersey City, N.J.
8-9 William Johnson	233 McEldor Ave	Jersey City, N.J.
9-10 Thomas M. Simms	351 Jackson Ave	Jersey City, N.J.
10-11 B. Watterman	77 Jackson Ave	Jersey City, N.J.
11-12 Fred Yeherton	104 Wilburson Ave	J.C.N.T.
12-13 Donald D. Howard	18 Brinkhoff St	J.C.
13-14 Kenneth C. Nathan	87 W. W. St.	J.C.
14-15 John Burgess	296 Benson Ave	J.C. N.J.
15-16 George J. Harcott	122 Clark St.	J.C. N.J.
16-17 Harry Hill	109 Atlantic St	J.C.
17-18 Willie J. Muelken	115 Carteret Ave.	J.C.
18-19 John J. Muelken	83 Armstrong Ave	J.C. N.J.
19-20 John J. Muelken	540 Jackson	J.C. N.J.
20-21 Harold Muelken	322 Forrest	J.C. N.J.
21-22 Anna Hatcher	238 Clinton Ave	J.C. N.J.
22-23 Elvira Miller	55 Clinton Ave	J.C. N.J.
23-24 Dorothy Hatcher	222 Clinton Ave	J.C. N.J.
24-25 William Hatcher	43 H. H. Ave	J.C. N.J.
25-26 William Hatcher	604 Brinkhoff Ave	J.C. N.J.
26-27 Harold Jones	573 H. H. Ave	J.C.
27-28 Robert Palmer	76 H. H. Ave	J.C.
28-29 Frank Palmer	71 Kearney Ave	J.C.
29-30 William Palmer	95 Grant Ave	J.C. N.J.
30-31 Donald Franklin	253 Stegman St	J.C. N.J.
31-32 William Hargrave	100 Grant Ave	J.C. N.J.
32-33 William Hargrave	139 Carteret Ave	J.C. N.J.
33-34 William Hargrave	143 Myrtle Ave	J.C. N.J.
34-35 John Hargrave	56 Atlantic St	J.C. N.J.
35-36 M. Hargrave	141 Claremont	J.C. N.J.
36-37		
37-38		
38-39		
39-40		
40-41		
41-42		
42-43		
43-44		
44-45		
45-46		
46-47		

7) THIS SET OF SIGNATURES IS ONLY PART OF A PETITION.

A petition for House of Representatives must contain 100 signatures and although the signature sheets are solicited separately, the entire petition must be bound together before submitting to the Secretary of State.

The witness taking the affidavit below must be the person who obtained the names on this set of signatures or several sets of signatures. He must take the affidavit as witness for each set he solicits, but must sign only one signature sheet endorsing the candidate.

STATE OF NEW JERSEY,

COUNTY OF HUDSON ss.

DAVID L. JONES, Jr., begin duly sworn, upon his oath saith that he is one of the signers
(Print Name of Witness)

of this petition; that such petition is signed by each of the signers thereof in his own proper handwriting; that each of such signers is, to the best knowledge and belief of deponent, a legal voter in the said State of New Jersey, as stated in said petition, and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person herein named in order to secure his nomination or selection as stated in said petition.

Subscribed and sworn to before me at

Jersey City, N.J.,
this 28th day of

APRIL, 1976

ADDISON M. McLEON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Nov. 12, 1978

(Signature of Witness)
44 ORIENT AVENUE
(Address of Witness)
Jersey City New Jersey
(City or Town) (Zip Code) 07305

8) CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE

I, the undersigned, hereby certify I accept the nomination herein and that I am a resident of and a legal voter in the jurisdiction of the office for which the nomination is made:

(Signature of Candidate)
DAVID L. JONES, JR.
(Typewritten Name of Candidate)
44 Orient Avenue
(Street Address and City) (Zip Code)
Jersey City N.J. 07305

IMPORTANT:

TOTAL NUMBER OF SIGNATURES ON PETITION

The Name, Address and Designation of the Candidate on this petition must be printed or typed. If not complied with, petition will be returned to be properly filled out.

The information given in this petition as to the above is used in certifying to the County Clerk.

PLEASE PRINT OR TYPE NAME OF CANDIDATE

PETITION OF NOMINATION FOR GENERAL ELECTION

NOVEMBER 2, 1976

PETITION FOR HOUSE OF REPRESENTATIVES

Signatures Required 100

To The Honorable Secretary of State:

Each signer of this petition certifies that the following statements are true:

1) I reside in the State of New Jersey in the 14th Congressional District; 2) I am legally qualified to vote for such candidate; 3) I pledge myself to support and vote for the person named in this petition for the office of House of Representatives; 4) I have not signed any other petition for the primary or general election for House of Representatives; 5) I request that you cause to be printed upon the official general election ballot the name of the candidate and his designation of party or party principle;

BRING US TOGETHER

(Must not exceed three words and must be in accord with R.S.19:13-4)

Name of Candidate	Number, Street or Avenue	City	Zip Code
DAVID L. JONES, JR.	44 ORIENT AVE.	Jersey City	N.J. 07305

SIGNATURE SHEET

6) Signature and address must be written (not printed) in the signer's own handwriting;

Name	Number, Street or Avenue	City
1. [Signature]	232 Warren Pkwy	Jersey City, NJ
2. [Signature]	75 Prospect St	Jersey City, NJ
3. [Signature]	75 Prospect St	Jersey City, NJ
4. [Signature]	243 Stegner St	J.C. N.J.
5. [Signature]	52 Landolph	J.C. N.J.
6. [Signature]	11 Lexington	J.C. N.J.
7. [Signature]	232 Warren Pkwy	J.C. N.J.
8. [Signature]	232 Warren Pkwy	J.C. N.J.
9. [Signature]	5 Highland Drive	J.C. N.J.
10. [Signature]	815 Grand St	J.C. N.J.
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		

7) THIS SET OF SIGNATURES IS ONLY PART OF A PETITION.

A petition for House of Representatives must contain 100 signatures and although the signature sheets are solicited separately, the entire petition must be bound together before submitting to the Secretary of State.

The witness taking the affidavit below must be the person who obtained the names on this set of signatures or several sets of signatures. He must take the affidavit as witness for each set he solicits, but must sign only one signature sheet endorsing the candidate.

STATE OF NEW JERSEY,

SS.
COUNTY OF HUDSON

HELEN DOUGLAS, begin duly sworn, upon his oath saith that he is one of the signers
(Print Name of Witness)

of this petition; that such petition is signed by each of the signers thereof in his own proper handwriting; that each of such signers is, to the best knowledge and belief of deponent, a legal voter in the said State of New Jersey, as stated in said petition, and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person herein named in order to secure his nomination or selection as stated in said petition.

Subscribed and sworn to before me at

Jersey City, N.J.,
this 28th day of
APRIL, 1976



ADDISON M. McLEON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Nov. 12, 1978

Helen Douglas
(Signature of Witness)
52 Randolph Avenue
(Address of Witness)
Jersey City New Jersey
(City or Town) (Zip Code)

07305

8). CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE

I, the undersigned, hereby certify I accept the nomination herein and that I am a resident of and a legal voter in the jurisdiction of the office for which the nomination is made:


(Signature of Candidate)

DAVID L. JONES, JR.
(Typewritten Name of Candidate)

44 ORIENT AVENUE
(Street Address and City) (Zip Code)

Jersey City
New Jersey 07305

FILED

APR 29 1976
CLERK OF SUPERIOR COURT
TREASURY

8304037078

ON

RECEIVED

77

From: SECRETARY OF STATE
STATE HOUSE
TRENTON, N. J. 08625

TO: OFFICE OF LEGAL COUNSEL

FEDERAL ELECTION COMM.

ATTN: BIZ VAN GELDER

1325 K STREET, N.W.

WASHINGTON, D.C. 20463

FORM C-37-Z

HARRISON A. WILLIAMS, JR., N.J., CHAIRMAN

JENNINGS RANDOLPH, W. VA.
CLAIBORNE PELL, R.I.
EDWARD M. KENNEDY, MASS.
GAYLORD NELSON, WIS.
WALTER F. MONDALE, MINN.
THOMAS F. EAGLETON, MO.
ALAN CRANSTON, CALIF.
WILLIAM D. RATHBUN, MAINE

JACOB K. JAVITS, N.Y.
RICHARD S. SCHWEIKER, PA.
ROBERT TAFT, JR., OHIO
J. GLENN BEALL, JR., MD.
ROBERT T. STAFFORD, VT.
PAUL LAXALT, NEV.

DONALD ELISBERG, GENERAL COUNSEL
MARJORIE M. WHITTAKER, CHIEF CLERK

United States Senate

COMMITTEE ON
LABOR AND PUBLIC WELFARE
WASHINGTON, D.C. 20510

March 11, 1977

770830

RESPECTFULLY REFERRED TO:

Congressional Liaison
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

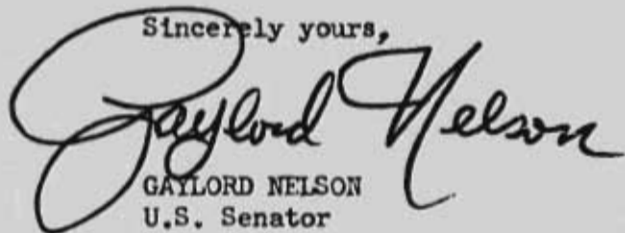
RE:

Enclosed information from the US Labor Party in Milwaukee,
which contains several allegations about FEC actions.

Please give this inquiry such consideration as the attached communication
may warrant.

Thank you very much for this courtesy, and I shall look forward to your early
reply. Please address all correspondence about this matter to my Home
Office, 570 Federal Building, Milwaukee, Wisconsin 53202.

Sincerely yours,


GAYLORD NELSON
U.S. Senator

GN:jhm
Enclosure

STATE OF WISCONSIN }
MILWAUKEE COUNTY } ss.

I, Wayne Hintz, being first duly sworn on oath depose and say as follows:

1. That deponent resides at 3109 N. 38th St., Apartment #12, Milwaukee, Wisconsin.
2. That Lyndon H. LaRouche Jr. was the U.S. Presidential candidate of the U.S. Labor Party in the 1976 general election, and that his name appeared on the Nov. 2, 1976 ballot in the State of Wisconsin as a candidate for said office. Deponent further states that the Committee to Elect LaRouche manages a fund designated for matching funds as provided for under U.S. Federal election laws.
3. That on or about January 25, 1977 a man and a woman respectively introducing themselves as Bob Dougherty and Peggy Sims, and identifying themselves as employees of the Federal Election Commission, called in person at the deponent's apartment at 3109 N. 38th St., Milwaukee, Wis., at approximately 6:00 P.M.
4. That Peggy Sims informed deponent that he had been randomly selected from a list of Wisconsin contributors to the Committee to Elect LaRouche to participate in a survey, the purpose of which was to determine the validity of said contributions.
5. That Bob Dougherty read from a list comprised of sums of money allegedly contributed by deponent to the Committee to Elect LaRouche, and asked deponent whether he remembered making said contributions in these specified sums on certain specified dates.
6. That although deponent did lawfully contribute money to the Committee to Elect LaRouche, and so informed Bob Dougherty and Peggy Sims, extant records of the contributions, including their amounts and the dates on which they were given, were not readily available to deponent

at the time of his conversation with Bob Dougherty and Peggy Sims.

7. That because of the inaccessibility of deponent's records, oral confirmation by deponent of said contributions was tentative, and not necessarily accurate, and deponent so informed Bob Dougherty and Peggy Sims at the time.

8. That questions circumvent to deponent's possible contributions to the Committee to Elect LaRoc he were also asked of him, to wit:

*Whether or not he was employed at the time of these possible contributions, and if so, the nature of employment.

* Whether or not deponent organized for the U.S. Labor Party at the time of these possible contributions, and if so, whether or not any monetary compensation was received for such organizing.

*What the address was of the U.S. Labor Party's Milwaukee, Wisconsin office.

*Whether or not deponent was acquainted with Teana Wright, a member the U.S. Labor Party residing in Milwaukee, Wisconsin.

Wayne King

Subscribed and sworn to before me

this ____ day of February, 1977.

Notary Public, Milwaukee Co., Wisconsin

Mr. Robert C. Liotta
Liotta, Master & Buffone
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

Re: MUR 368

Dear Mr. Liotta:

In conjunction with our phone conversation of March 1, 1977, please find enclosed your copy of the correspondence sent to your clients by the General Counsel on February 28, 1977. Please forgive the omission.

As I explained in our conversation, MURs 281 and 328 have not yet been closed even though your clients have filed the year end reports and report, in the origins of the \$90,000.

As stated in the Commission's letter to your clients the failure to file the reports in a timely fashion affords reason to believe that the Act was violated. Under the Act, your client has an opportunity to demonstrate why no action should be taken against it for this apparent failure to comply with the law.

Your client's prompt response to the allegations contained in MUR 368 should aid in the resolution of all the cases before the Commission.

If you have any questions, don't hesitate to call me. Thank you for your cooperation.

Sincerely yours,

Biz Van Gelder
Attorney

Enclosure
BVandGelder:pjg:3/8/77
cc: Chron file
MUR file
BV



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 28, 1977

Committee to Elect
Lyndon LaRouche
Marica Merry Pepper,
Chairperson
P.O. Box 1972
New York, New York 10001

Re: MUR 368 (77)

Dear Ms. Pepper:

On February 10, 1977, the Commission determined that there is reason to believe that your Committee has committed violation of 2 U.S.C. §441f of the Federal Election Campaign Act of 1971, as amended (the Act) by knowingly accepting contributions made by one person in the name of another.

The basis for the above allegation stems from the individual verification process FEC investigators conducted pursuant to CTEL's request for matching funds. During that time, the investigators found it difficult to confirm the existence of a number of CTEL listed contributions. (See attached sheet).

The Commission's determination is based on inquiries made during its attempts to verify contributions submitted for matching funds which suggested that monies had not been given by the individuals in question but by another person.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. For instance, material pertaining to the state or local campaigns coordination at the national level would be appreciated.



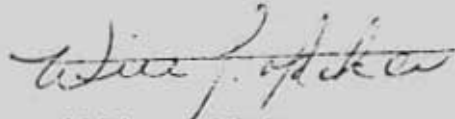
- 2 -

If you have any questions, please contact Barbara Van Gelder (telephone no. 202/382-6646), the attorney assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "William Oldaker", written in dark ink.

William Oldaker
General Counsel

Call for a Congressional Investigation of the Federal Election Commission

Memorial to Congress from the U.S. Labor Party
and the Committee to Elect LaRouche

February 14, 1977

FEC Harassment of Contributors to the Committee to Elect LaRouche

The Committee to Elect LaRouche raised approximately \$127,000 from 2,300 contributors over the course of the primary election campaign period ending Oct. 15, 1976. To meet the federal matching fund requirement of \$100,000, or at least \$5,000 from each of 20 states, the Committee submitted to the Federal Elections Commission xerox copies of checks, money orders and other written instruments totalling approximately \$109,000.

After the FEC contested contributions from 11 states, the Committee submitted additional verification of contributions which brought each state over the minimum \$5,000 matching fund requirement.

Early on the morning of Jan. 25, 1977, individuals purporting to be Federal Elections Commission agents commenced an unprecedented harassment of contributors to the Committee to Elect LaRouche both at their homes and at their places of employment. The formal decision to authorize the unannounced visits was reached at the FEC's Jan. 14 meeting. According to the FEC's own "Analysis of Contributions Confirmation for the Committee to Elect LaRouche," released Feb. 10, agents tried to canvas 70 contributors in each of three states -- Massachusetts, Wisconsin, and Delaware with 88, 35 and 27 documented contributors respectively. On the basis of these interrogations, the Committee's request for federal primary matching funds was denied.

The series of events leading up to such unprecedented door-to-door investigations as well as the questionable nature of the interrogations to which some of those visited were subjected attests to Labor Party charges that the FEC is now functioning as a covert "plumbers" unit on behalf of the policies of the Carter-Trilateral Commission administration.

Sources close to Capitol Hill informed CTCL that the "spot checks" on contributors was designed to intimidate CTCL supporters, and to gather evidence pertinent to the denial of federal matching funds as well as to a criminal investigation of the U.S. Labor Party and the National Caucus of Labor Committees and the Committee to Elect LaRouche. According to these same sources, the Carter election committee asked the Department of Justice to open such an investigation on Nov. 2, 1976 following an election eve paid political broadcast by the U.S. Labor Party's presidential candidate Lyndon H. LaRouche, Jr. on national television. LaRouche stressed that election day vote fraud would place Jimmy Carter at the head of a Trilateral Commission takeover of constitutional government in the United States.

The FEC's sudden transformation, Jan. 25 into a Cointelpro front for such federal agencies as the General Accounting Office, the Public Integrity section of the Justice Department, and the Treasury Department was, according to these sources, effected for the purpose of creating and compiling the evidence

for criminal frameups of the U.S. Labor Party and the National Caucus of Labor Committees.

FEC Coercion and Intimidation

Barring actual abductions of individuals, the tactics used during the interrogations of CTCL contributors has no better parallel in history than the "night and fog" tactics employed by Adolf Hitler's SS division. Also, most members of Congress and the press corps have no difficulty in recalling the days of Senator Joseph McCarthy. A total of 70 admitted visits took place at all hours and in such a manner as to maximize their intimidating effect -- early in the morning to elderly contributors and on-the-job visits to those who would likely be vulnerable. This procedure has never been used in FEC records check, with the partial exception of one campaign which the FEC will not identify. Standard FEC practice is to mail contributors a questionnaire with a cover letter from the candidate requesting their compliance. Neither LaRouche nor any CTCL contributors received any notice prior to the sudden visits which commenced January 25.

Seventy visits or attempts to visit were admitted to by the FEC in their "Analysis of Contributions Confirmation" of Feb. 10. The following cases are representative of the actions taken by FEC agents as described by CTCL supporters who reported the incidents to the Labor Party. Affidavits from these individuals will reveal the full extent of the harassment operation and provide part of the evidence of coercion and interrogation when counsel for CTCL files a "Petition to Review" the FEC's actions this coming week in the District of Columbia Court of Appeals. Co-petitioner in the suit brought by Lyndon LaRouche, Jr. and CTCL will be Leroy Jones, who was visited at his Delaware home at 7:45 AM by two FEC operatives.

At 7:45 AM on Jan. 25, agent Keith Vance and a second agent arrived unannounced at the home of Delaware Labor Party member Leroy Jones, a retired worker. For over two hours the agents demanded that Jones and his wife produce check stubs proving their contributions. Vance interrogated Mr. Jones on whether he receives a stipend from the Labor Party and how he could afford to make a contribution.

At 11:00 AM on Jan. 25, the same agents interrogated a student member of the USLP: "Who is the Delaware Labor Party chairman...when did he give you the money for the contribution, how much did he give you?" Receiving negative answers to these fraudulent frameup questions, the agents coerced the member into signing a statement on his replies. Shortly afterward, the agents staked out the home of a third Delaware contributor to question him when he walked out the door.

On Jan. 25, two FEC agents arrived at the office of the Boston, Mass. Labor Party without prior an-

nouncement and demanded information on contributors to the LaRouche presidential campaign. They identified themselves as William C. Yowell, FEC badge number 041, and Elmo Allen, FEC badge number 024, and asked for the phone numbers of specific contributors. They refused to specify to Massachusetts Labor Party Chairman Larry Sherman the nature of their request for the phone numbers. Sherman requested that they leave and make all future requests through the mail.

A short time later in Boston, agents Yowell and Allen visited CTCL contributor Charles Park at the Lahey Clinic where he is employed as a clerk.

USLP member Sue Chaplin received a phone call at her job at the Logan Hilton Hotel from FEC agents

requesting an interview with her at her home and asking whether she had made a contribution to CTCL:

The mother of Labor Party member Frank Comeau received a call from FEC agents who were clearly phoning all the "Comeaus" in the telephone book.

On Jan. 26, Yowell and Allen returned to the Boston Labor Party office requesting permission to examine the local's financial books. When asked to leave they called state USLP chairman Sherman at home.

On Jan. 26, Theo Ford, a USLP supporter in Milwaukee, Wis. was called at home at 9:00 AM and questioned extensively on the dates and amounts of his contributions to CTCL. Callers informed other Wisconsin Labor Party members that they were "doing a survey for the FEC. You are one of the lucky ones."

Chronology of FEC Stalling on CTCL Matching Funds

October 15, 1976 - Letter sent to Federal Elections Commission by LaRouche informing the FEC that the \$100,000 matching fund threshold has been reached.

Oct. 16 - U.S. Labor Party Convention nominated Lyndon H. LaRouche, Jr. as its 1976 candidate for president of the United States.

Oct. 19 - FEC chief auditor Joseph Stoltz reports that audit of the CTCL books could begin by Oct. 26 if approved at that day's Commission meeting; Commission does not place CTCL on agenda at Oct. 19 and thereby begins its months' long stall on CTCL funds.

Oct. 28 - CTCL files case in Washington, D.C. Federal Court charging FEC with violation of statute requiring action by FEC within ten days of a candidate's having established matching funds eligibility. CTCL requests that money be granted before Nov. 2 election.

Oct. 29 - Case denied.

Nov. 1 - CTCL appeals case to Supreme Court Chief Justice Warren Burger. Appeal denied.

Nov. 4 - FEC meeting approves audit of CTCL receipts and expenditures.

Nov. 5 to Nov. 20 - FEC conducts field audit of CTCL expenses but contributions are not checked. Auditor Stoltz promises prompt check of contributors records at FEC headquarters.

Dec. 3 - Stoltz reports that contributor audit by the FEC is completed. The FEC claims that 11 states are under \$15,000 qualifying threshold.

Dec. 10 - CTCL submits reverification of documentation showing over \$5,000 in contributions from 11 contested states.

January 12, 1977 - CTCL attorneys begin to issue a series of ultimatums to FEC demanding immediate FEC decision on CTCL request for matching funds.

Jan. 25-28 - FEC agents conduct surprise visits at odd hours to CTCL contributors and their employers in three states, Wisconsin, Delaware, and Massachusetts. FEC interrogations were conducted to coerce contributors into denying their contributions. The FEC did not notify CTCL that such visits and interrogations would take place.

Feb. 10 - FEC meeting denies CTCL matching funds claim on grounds that CTCL did not qualify in three states, Wisconsin, Delaware, and Massachusetts.

Call for a Congressional Investigation of the Federal Election Commission

The Committee to Elect LaRouche has filed with the District of Columbia Circuit Court of Appeals a Petition for Review of the Federal Elections Commission's Feb. 10 denial of \$111,000 in primary matching funds which is due to the Committee, and its conduct of harassment against contributors to LaRouche. Lyndon H. LaRouche, Jr. was the U.S. Labor Party candidate for president in 1976. With the filing of this petition, the committee, in conjunction with the U.S. Labor Party, issues an emergency call to Congress to initiate an investigation of the FEC, to examine, in conjunction with the court, the criminal and partisan abuses of the Federal Elections commission.

An investigation of the specific actions taken by the FEC against the LaRouche campaign and the U.S. Labor Party will establish beyond doubt that the Federal Elections Commission has been transformed since at least Nov. 2, 1976, into a "plumbers operation" against any potential political opposition to the Carter Administration and its policies formulated by the Trilateral Commission.

Since November 1976, the Federal Elections Commission deliberately stalled on processing the LaRouche matching funds claim and disbursing the funds due. In January 1977, the Federal Elections Commission launched a campaign of deliberate harassment against LaRouche contributors which included house visits and coercion. On Feb. 10, the Federal Elections Commission officially refused to provide the funds due, on the allegation that insufficient funds had been raised by the LaRouche campaign in three states.

At the same time, the Federal Elections Commission has refused to initiate an investigation of the Jimmy Carter campaign fund expenditures, despite the fact, as covered widely by the press, that hundreds of thousands of dollars were expended under the item "To Get Out the Vote." These slush fund categories were spent exactly in those areas where significant vote fraud was perpetrated Nov. 2, as shown in evidence brought forward in federal courts in New York and Ohio.

Despite these flagrant abuses of office, the Federal Elections Commission has submitted to Congress specifications for extending its jurisdiction to cover not only congressional campaign funds, but "office funds," as well. If Congress does not specifically veto these new regulations, they will go into effect this spring.

What is at stake in the conduct of the Federal Elections Commission is nothing less than constitutional government itself, as it was intended by the framers of the Constitution, and developed in the early decades of struggle to secure this nation. A congressional investigation into the Federal Elections Commission is required to prevent the institutionalization of an extra-legal special operations

squad which will be deployed for extra-constitutional political purposes.

The Federal Elections Commission was established in the aftermath of the Nixon Watergate. For some it was an expression of a genuine desire to ensure honest elections practices. However, for its prime movers, John Gardner and Common Cause, it was a deliberate maneuver to set in place an agency which could be manipulated, Ralph Nader-style, into conducting vendetta investigations of federal elected officials for political policy reasons. This aim was consolidated by the coordinated actions of William F. Buckley and Eugene McCarthy, respectively the "right" and "left" wings of a policy nexus which includes principal backers of the Carter campaign. Buckley and McCarthy jointly filed a suit on the Federal Elections Commission, *Buckley v. Valeo*, whose net effect when upheld by the Supreme Court in early 1976, was to strip Congress of its control over the Federal Elections Commission, and to arrogate more elections control into the Justice Department.

A case is currently pending concerning the Federal Elections Commission brought by Ramsey Clark which would complete the institutionalization of the Federal Elections Commission as a certified plumbers unit. As the suit has been framed by Clark, who is deliberately functioning to subvert the Constitution, the Burger Court has leeway to decide that the "One House Veto" powers which Congress possesses to prevent the Federal Elections Commission's extension of jurisdiction should be eliminated. The Federal Elections Commission would then have free license to arbitrarily and criminally intervene in elections.

Thus the question of the conduct of the Federal Elections Commission is of much larger import than any mere "administrative issue." Moreover, decisive action by Congress to investigate the Federal Elections Commission will serve notice to those in the Carter Administration and Common Cause networks that no general governmental reshuffles in the name of "reorganization" or "ethics codes" will be tolerated at this time.

Until the Federal Elections Commission is properly investigated and until the full facts come out on the scale and culpability of the Nov. 2 vote fraud, as Congress has now begun to investigate regarding Congressional District elections, no changes of governmental structure are in the interests of the nation.

The Federal Elections Commission's "LaRouche files" are one appropriate means for opening a full investigation into the Federal Elections Commission and related essential questions. Such an investigation is critical to restore confidence in elections and in the governing institutions of the country. Without such an investigation, Congress stands to become a mere "show Parliament" in a nation ruled by decree.

**ANALYSIS OF CONTRIBUTION CONFIRMATION FOR
THE COMMITTEE TO ELECT LYNDON LaROUCHE**

STATES

	Delaware	Massachusetts	Wisconsin
Number of Interviews Attempted	23	26	21
<u>COULD NOT LOCATE:</u>			
Contributor Not at Home		11 \$1,900.60	8 \$1,950.00
Insufficient Time to Locate		6 \$1,435.00	2 \$ 500.00
Did Not Live at Address	16 \$3,681.50	1 \$ 140.00	2 \$ 499.50
No Such Address			2 \$ 430.00
Unknown by Listed Employer		1 \$ 250.00	
<u>PERSONS CONTACTED:</u>			
Refused to be Interviewed		6 \$ 789.00	2 \$ 499.72
Confirmed All of Contribution	5 \$1,002.00	1 \$ 250.00	
Confirmed a Portion of Contribution	1 \$ 80.00 <u>1 /</u>		2 \$ 125.00 <u>2 /</u>
Denied Making Contribution			1 \$ 250.00
Confirmed But Not Own Funds Used	1 \$ 250.00		
Confirmed But Portion from Sale of New Solidarity			2 \$ 496.40
Contribution Verified In-House	\$5,036.75	\$5,159.85	\$5,172.62
Verified Amount After Contributor Contact	\$ 935.25	\$4,769.85	\$3,256.72

1 / Confirmed \$80 of \$250 contribution; \$170 was collected from roommates.

2 / Contributor confirmed \$100 of a \$250 contribution.
Contributor confirmed \$25 of a \$115 contribution.

BEFORE THE FEDERAL ELECTION COMMISSION

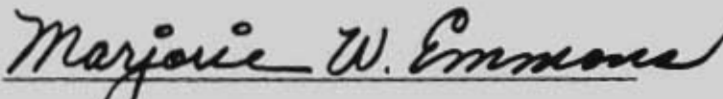
In the Matter of)

Committee to Elect Lyndon LaRouche)
(CTEL), U.S. Labor Party)
(Del., Wisc. Mass., and Pa.)
Regional Offices))

MUR 368 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 10, 1977, the Commission determined by a vote of 6-0 to find reason to believe that a violation of 2 U.S.C. §441(f) and 26 U.S.C. §9042(d) had been committed in the above-captioned matter.


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

Clark

January 13, 1977

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: Orlando B. Potter *OBP*
Bill Oldaker *BO*
Bob Costa *BC*

FROM: Joe Stoltz *JS*
Charlie Steele *CS*

SUBJECT: Recommendation to Confirm Contributions to the Committee
to Elect Lyndon LaRouche with Contributors

During the meeting of December 29, 1976, the Commission considered the attached memorandum dated December 27, 1976. This memorandum outlined the reasons that the staff believes further audit work is needed before matching payment eligibility can be determined in the case of the Committee to Elect Lyndon LaRouche. Part of the additional work that is considered necessary is the confirmation of contributions with contributors. The staff would propose to begin this process simultaneously with the commencement of the additional work at Committee headquarters. The staff further proposes to accomplish this confirmation via personal interviews. The personal interview method was chosen because of the patterns of contributions outlined in the December 27th memorandum and patterns of cash contributions developed since that time.

If no objection is raised within 24 hours, the staff will proceed as outlined above.

Attachment





FEDERAL ELECTION COMMISSION

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

*Letter to 12/28/76
Charles Steele 10:30
Vote 5-0 in favor*

December 27, 1976

MEMORANDUM

TO: THE COMMISSION

THROUGH: John G. Murphy, Jr.
Orlando B. Potter *G. Keenan*
Gordon Andrew McKay *for*

FROM: Joe Stoltz *for Jan*
Charles N. Steele

SUBJECT: Recommendation to Expand Audit of Committee to Elect
Lyndon LaRouche to include Related Organization

At its meeting of November 4, 1976, the Commission approved a matching fund threshold audit of the Committee to Elect Lyndon LaRouche.

At the present time the Committee to Elect Lyndon LaRouche (CTEL) has reached the required threshold in 18 states and has collected in excess of \$5,000 in 2 others. The Committee is currently obtaining the required documentation in these two states. The short fall is \$69.00 in Connecticut and \$195.00 in Indiana. It is the staff's belief that the requisite documentation will be submitted within a few days. If so, sometime in early January the submission will be ready for presentation to the Commission, with evidence pertaining to CTEL's nomination and primary processes.

At the same time, the staff intends to continue its audit work and feels it would be helpful to expand it to include examination of records of organizations associated with CTEL. We believe this because the Committee to Elect Lyndon LaRouche occupies space and has common personnel with four other organizations (see Attachment 1). These four organizations also account for the majority of CTEL's expenditures and debt (see Attachment 2). During review of the Committee's itemized contributions exceeding \$100, it was noticed that a number of contributors had a common occupation, that of Volunteer Organizer for the National Caucus of Labor Committees (NCLC). The NCLC is an unregistered committee, which made in-kind contributions of \$6,250.00 to CTEL, and which has no salaried employees. These contributions from NCLC Volunteer Organizers were scheduled and compared to the twenty states being used for threshold. Contributions from NCLC Volunteer Organizers



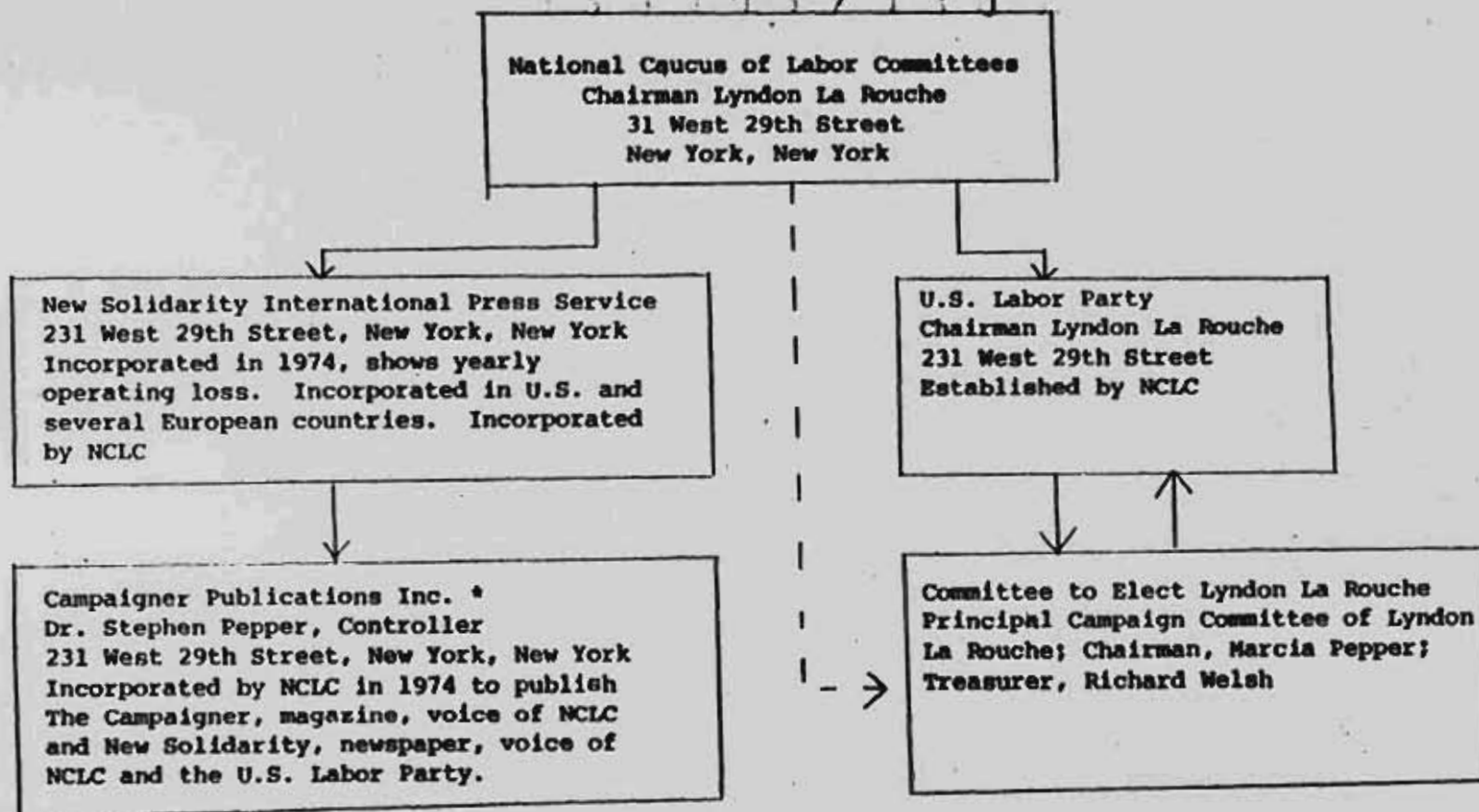
were received in 21 states (one of which was not used for threshold); 57% of these contributions were received in the last two weeks of the eligibility period (while only 41% of the total contributions were received during the same period).

NCLC Volunteer contributions also account for 16% of the total contributions received. Moreover, the five states shown below are of particular interest because of the percentage of the funds received that were contributed by NCLC Volunteer Organizers and the timing of those contributions.

<u>State</u>	<u>Percentage of Total Contributions from NCLC Volunteer Organizers</u>	<u>Percentage of NCLC Volunteer Organizer Contributions in October</u>
Illinois	30.4%	82.8%
Massachusetts	27.7%	79.9%
Missouri	24.2%	42.0%
New Jersey	29.7%	43.0%
Wisconsin	52.7%	83.2%

NCLC also received payments from CTEL of \$31,808.27 during the period of October 1 through October 18, 1976, which accounts for 55.22% of all CTEL expenditures for that period. Further, CTEL raised 99.3% of its total contributions in 20 threshold states with only \$870.00 raised in the remaining 31 states. Examination of CTEL contributor records shows that numbers of contributors made contributions of \$50.00 or more in the last weeks of the eligibility period. Also included are several cases where more than one such contribution was received on the same day and/or on consecutive days from the same contributor. In many cases, the contributor's listed occupation seems unusual for fairly heavy political contributions. Although these patterns do not prove any irregularities in the Committee's contributions, the staff believes that audit work on NCLC, and confirmation of contributions with contributors to CTEL should be done before any initial payments are made. This audit work would include audit of records of the U.S. Labor Party, which raised \$96,000.00 in cash for the 30-minute NBC broadcast by Mr. LaRouche on November 1, 1976, as well as Campaign Publications, Inc., and New Solidarity International Press, Inc., which, with NCLC, are CTEL's major creditors. Accordingly, the staff would like authority to continue this audit in accordance with this recommendation.

ORGANIZATION CHART



* The Campaigner and New Solidarity are
sold directly to NCLC who makes distribution.
Campaigner Publications operates at a loss.

ATTACHMENT #2 -- Page 1

DEBT STRUCTURE AT 10/16

DEBT OWED WITHIN THE GROUP:
\$126,162.42

PERCENTAGE OF TOTAL DEBT:
97.0%

NATIONAL CAUCUS OF
LABOR COMMITTEES

Debt at highest
point \$62,074.20
at 9/76.

No payments
to date.

Rent

Legal Services

\$52,844.90
40.63%

\$37,150.00
28.56%

Campaigner Publications Inc.
For Advertising, Video Tape
Production, and printing
10/16 is the highest point
for this vendor

U.S. Labor Party

New Solidarity International
Press Service
Research and preparation of
position papers. No payments
made until 10/76, services
provided starting in 1975

Committee to Elect
Lyndon La Rouché

\$12,511.52 9.62%

\$23,656.00 18.19%

**Expenditures From Committee to Elect Lyndon LaRouche
to the Related Organizations**

National Caucus of Labor Committees
Rent for New York and all field
offices \$8990 per month
Legal Services, No payments made
for Legal Services at 10/18/76

Total Expenditures
within the group \$103,777.94
Percentage of Total Expenditures
78.32%

New Solidarity International Press Services
Did research and preparation of
position papers.

U.S. Labor Party
Received contributions.
No services provided in consideration.

Campaigner Publications Inc.
Advertising, Video Tape Production
and Printing
Sold no other advertising

Committee to Elect Lyndon La Rouche

\$5,303.18:4%

\$47,269.76:35.17%

\$1,725.00:1.30%

\$49,480.00:37.34%

Purchased advertising from no other source



FEDERAL ELECTION COMMISSION

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

Mr. Lyndon H. LaRouche, Jr.
Committee to Elect Lyndon LaRouche
P. O. Box 1972, G.P.O.
New York, New York 10001

Dear Mr. LaRouche:

This letter is in response to your certification to the Commission for eligibility for Presidential Primary Matching Funding. Prior to conducting an audit of your threshold submission, the Commission raises several preliminary questions.

The Presidential Primary Matching Funding is provided to candidates seeking Presidential nomination for a political party in primary elections. Primary election is defined in 26 U.S.C. §9032(7) to mean:

. . . an election, including a runoff election or a nominating convention or caucus held by a political party, for the selection of delegates to a national nominating convention of a political party, or for the expression of a preference for the nomination of persons for election to the office of President of the United States.

The limitation of the public funding to candidates running in party primaries was upheld by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976). Accordingly, we request your submission of a listing of all party primaries in which you were a candidate for the nomination of the U.S. Labor Party for the 1976 election.



An additional question concerns the determination of your matching payment. This term is defined in 26 U.S.C. §9032(6) to mean:

. . . the period beginning with the beginning of the calendar year in which a general election for the office of President of the United States will be held and ending on the date on which the national convention of the party whose nomination a candidate seeks nominates its candidate for the office of President of the United States, or, in the case of a party which does not make such nomination by national convention, ending on the earlier of--

(A) the date such party nominates its candidate for the office of President of the United States; or

(B) the last day of the last national convention held by a major party during such calendar year.

To assist the Commission in determining the matching payment period, we would appreciate your providing answers to the following questions:

(1) Are you listed on any State ballots for the 1976 election as the Presidential nominee of the U.S. Labor Party? If so, what was the date of your qualification for that ballot?

(2) Does the U.S. Labor Party have a national convention at which its candidate for the office of President is nominated? If so, what was the date of the national convention for the 1976 election?

(3) If the U.S. Labor Party does not nominate its candidate for a national convention, the date the party nominated its candidate for the 1976 election *and the*

method used to nominate .

- 3 -

We appreciate your assistance in this matter, an early response will facilitate the Commission in processing your certification request.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

cc: Robert Case Liotta, Esq.
1619 New Hampshire Ave., N.W.
Washington, D. C. 20009

3370370303

Lyndon LaRouche for President

Wayne Evans for Vice President

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

RECEIVED
HAND DELIVERED

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001

Marcia Merry, Chairman
Richard Welsh, Treasurer
212-563-5600

762899

October 14, 1976

Dear Sir:

I hereby certify that I have fulfilled all conditions for obtaining matching funds, and therefore request such funds pursuant to Sections 9036 and 9037 of the Federal Election Campaign Laws.

In compliance with Section 9033(b) of the Federal Election Campaign Laws, I hereby certify that:

1. I and my authorized committees will not incur qualified campaign expenses in excess of the limitations on such expenses under Section 9035;
2. I am seeking nomination by the U.S. Labor Party for election to the office of President of the United States;
3. I have received matching contributions which in the aggregate exceed \$5,000 in contributions from residents of each of at least 20 states; and
4. the aggregate of contributions certified with respect to any person under paragraph (3) does not exceed \$250.

In compliance with Section 9033(a), I agree to an audit and examination by the Federal Election Commission under section 9038, and that pursuant to such examination to provide any evidence, records, books and other information the Commission may request.

Sworn to before me this

14 day of October, 1976.

David S. Heller
Notary Public

David S. Heller, Notary Public
Qualified in New York, No. 31-4620080
Qualified in New York County
Commission Expires March 30, 1977

Lyndon H. LaRouche, Jr.
Lyndon H. LaRouche, Jr.

Vote U.S. Labor Party 1976



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 10 1977

Mr. Richard Welsh
Committee to Elect Lyndon
LaRouche
P.O. Box 1972 G.P.O.
New York, N.Y. 10001

Re: MUR 328 (76)

Dear Mr. Welsh

The Federal Election Commission has determined that there is reason to believe that Lyndon LaRouche and/or the Committee to Elect Lyndon LaRouche has committed a violation of 2 U.S.C. §434(b) of the Federal Election Campaign Act of 1971, as amended, by failing to disclose the source of a \$90,000 expenditure to the National Broadcasting Company.

Under the Act, you have a reasonable opportunity to demonstrate that no action should be taken against you.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of the matter. In particular, please submit all available documentation relative to the expenditure, and all documentation indicating who supplied the monies for the expenditure. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Andrew Athy, Jr. (telephone no. 202/382-6646), the attorney assigned to this case.

Sincerely yours,



PS Form 3811, Rev. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

66

● **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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ **RESTRICTED DELIVERY.**
Show to whom and date delivered..... 65¢

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery 85¢

2. **ARTICLE ADDRESSED TO:**

Mr. Richard Welsh

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438219</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Richard Welsh

4. **DATE OF DELIVERY**

5. **ADDRESS (Complete only if requested)**

6. **UNABLE TO DELIVER BECAUSE:**

NEW YORK, NY
FEB 14 1977
G.P.O.

☆ GPO : 1976-O-328-428

COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 10 1977

Mr. Lyndon LaRouche
359 Fort Washington Ave.
New York, N.Y.

Re: MUR 328 (76)

Dear Mr.

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Sincerely yours,

Handwritten signature



PS Form 3811, Nov. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

66

● **SENDER:** Complete items 1, 2, & 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..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ **RESTRICTED DELIVERY.**
Show to whom and date delivered..... 65¢

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery 85¢

2. **ARTICLE ADDRESSED TO:**

Mr. Lyndon LaRouche

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438218	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Mr. Lyndon LaRouche

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER (BECAUSE) CLERK'S INITIALS

NEW YORK
JUL 15 1976
U.S. MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

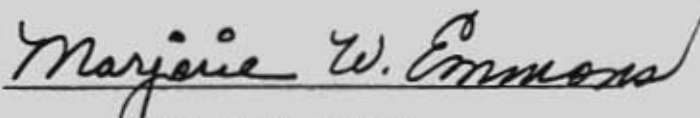
In the Matter of

Lyndon LaRouche, Committee to Elect }
Lyndon LaRouche; United States }
Labor Party }

MUR 328 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 3, 1977, the Commission determined by a vote of 6-0 that there was reason to believe that a violation of 2 U.S.C. §434(b) of the Federal Election Campaign Act of 1971, as amended, had been committed in the above-captioned matter.


Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

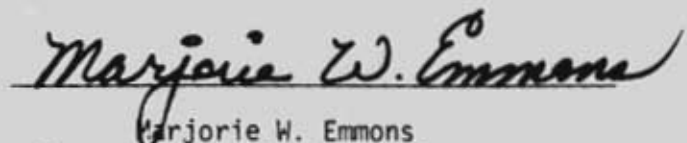
In the Matter of

Lyndon LaRouche, Committee to Elect }
Lyndon LaRouche; United States }
Labor Party }

MUR 328 (76)

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Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

February 3, 1977

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS *MJE by mce*

RE:

MUR 328 (76)

The above-mentioned MUR was transmitted to the Commissioners on January 1, 1977 at 9:30 a.m.

As of 11:00 a.m., February 3, 1977, all six Commissioners had approved the staff recommendation concerning MUR 328 (76).



Oldaker

DATE AND TIME OF TRANSMITTAL: 31 JAN 1977
1:30

NO. MUR 328 (76)
REC'D: _____

FEDERAL ELECTION COMMISSION
Washington, D. C.

Plaintant's Name: Internal on basis of November 2, 1976 U.P.I. wire story

Respondent's Name: Lyndon LaRouche, Committee to Elect Lyndon LaRouche;
United States Labor Party

Relevant Statute: 2 U.S.C. §434(a), and §434(b)

Internal Reports Checked: 10 day pre-election

External Agencies Checked: None

SUMMARY OF ALLEGATION:

That \$90,000 expended by the Committee to Elect Lyndon LaRouche
for an election eve broadcast was not obtained in compliance with
the Act..

PRELIMINARY LEGAL ANALYSIS

Without a report the source of the \$90,000 is not known. The pre-
election report shows only \$5,329.27 on hand two weeks before the
\$90,000 expenditure. The Committee to Elect Lyndon LaRouche is
named as a respondent because it is LaRouche's principal campaign
committee; the U.S. Labor Party is named because of LaRouche's
party affiliation to it. (continued)

RECOMMENDATION

Reason for belief in the \$90,000 expenditure, forward -attached-
latter

PRELIMINARY LEGAL
ANALYSIS

- 2 -

Notice of reasonable cause to believe has already
been forwarded to respondents for failure to file post
election reports.

10010170313



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lyndon LaRouche
359 Fort Washington Ave.
New York, N.Y.

Re: MUR 328 (76)

Dear Mr. LaRouche:

The Federal Election Commission has determined that there is reason to believe that Lyndon LaRouche and/or the Committee to Elect Lyndon LaRouche has committed a violation of 2 U.S.C. §434(b) of the Federal Election Campaign Act of 1971, as amended, by failing to disclose the source of a \$90,000 expenditure to the National Broadcasting Company.

Under the Act, you have a reasonable opportunity to demonstrate that no action should be taken against you.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of the matter. In particular, please submit all available documentation relative to the expenditure, and all documentation indicating who supplied the monies for the expenditure. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Andrew Athy, Jr. (telephone no. 202/382-6646), the attorney assigned to this case.

Sincerely yours,



U. P. I. • 11-2-76

POLITICS

WASHINGTON, (UPI) — THE FCC RULED TODAY THE NATIONAL BROADCASTING CO. MUST SELL EQUAL TIME TO THE U.S. LABOR PARTY PRESIDENTIAL CANDIDATE BECAUSE THE NETWORK IS ALLOWING REPUBLICANS AND DEMOCRATS TO BUY AIR TIME.

BOTH PRESIDENT FORD AND JIMMY CARTER PURCHASED NATIONWIDE ADVERTISEMENTS ON NBC AS WELL AS CBS AND ABC TELEVISION.

THE LABOR PARTY ASKED NBC TO SELL AT TIME THIS EVENING TO ALLOW ITS CANDIDATE, LYNDON LAROUCHE, TO MAKE AN APPEAL FOR VOTES. IT COMPLAINED TO THE COMMISSION WHEN NBC DECLINED TO SELL AT TIME.

A COMMISSION SPOKESMAN SAID THE 5-0 DECISION WAS THE FIRST TIME SUCH AN ACTION HAD BEEN TAKEN IN THE FCC SINCE THE NIGHTS BEFORE A PRESIDENTIAL ELECTION. HE SAID IT WOULD CONFORM WITH THE RULING ON THE POLITICAL ADVERTISEMENT WHICH GOES INTO EFFECT.

THE LABOR PARTY HAS ASKED LAST NIGHT TO BUY THE TIME AND WAS TOLD SUNDAY NONE WOULD BE AVAILABLE BECAUSE OF THE LATE REQUEST.

MILTON GROSS, CHIEF OF THE FCC FAIRNESS-POLITICAL BROADCASTING BRANCH SAID FORD AND CARTER GOT A HALF HOUR OF NETWORK TIME AND LAROUCHE IF HE IS A QUALIFIED CANDIDATE IS ENTITLED TO HIS HALF HOUR.

LAROUCHE SAID THE AD WAS INTENDED TO SHOW THE PARTY PLATFORM AND TO PRESENT OUR VIEW ON THE ROLE OF CARTER AND WHAT THE SIGNIFICANCE OF A 7 TO 10 MILLION VOTER TURNOUT FOR THE LABOR PARTY WHICH IS OUR GOAL.

LAROUCHE SAID THE PROGRAM WAS TAPED EARLIER TODAY AT A PRIVATE STUDIO.

Washington Post 11-2-76



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 28, 1977

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P.O. Box 1972
G.P.O. New York, N.Y. 10001

Re: MUR 281 (76)

Dear Ms. Pepper:

On November 10, 1976, we sent you a certified letter notifying you of the Commission's action on October 28, 1976. At that time, the Commission found reason to believe that you failed to comply with the reporting requirements of 2 U.S.C. §434.

We recognize that pursuant to your request for matching funds, your committee has submitted and authorized on placing (the public records) the names and address of your contributors on the public record; however, the omission of that information during the period from February 24 until November 10, 1976, afford the Commission (a finding of) reason to believe a violation of the above-mentioned sections of the Act has been committed.

Your committee was given 10 days from receipt of the November 10 letter to respond to the allegations. If you do not respond within 15 days of the receipt of this letter, we will assume that you do not wish to contest the allegations.



If you have any questions regarding this matter, please contact Biz Van Gelder, (202/382-6646), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker

William C. Oldaker
General Counsel

cc: Robert C. Liotta
Liotta, Master & Buffone
1619 New Hampshire Ave. N.W.
Washington, D.C. 20009

GL

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... 15¢
☐ Show to whom, date, & address of delivery... 25¢
☒ RESTRICTED DELIVERY.
 Show to whom and date delivered... 35¢
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery 55¢

2. ARTICLE ADDRESSED TO:
*Sample to Bob
 1619 New Hampshire Ave.
 Washington, D.C.*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *438449* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
Marcia Merry Pepper (V)

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

NEW YORK, NY
 MAR 2 1977
 P.O. INC.

★ 607.100-0-200-000

GL

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... 15¢
☐ Show to whom, date, & address of delivery... 25¢
☐ RESTRICTED DELIVERY.
 Show to whom and date delivered... 35¢
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery 55¢

2. ARTICLE ADDRESSED TO:
Marcia Merry Pepper

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *438449* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
Marcia Merry Pepper

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

NEW YORK, NY
 MAR 2 1977
 P.O. INC.

★ 607.100-0-200-000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Committee to Elect Lyndon LaRouche
P.O. Box 1972
G.P.O. New York, NY 10001

Re: MUR 284 (76)

Dear Sirs:

3
2
3
7
3
3
0
1
This letter is to notify you that the Federal Election Commission has concluded that it has reason to believe that you have failed to comply with the reporting requirements of 2 U.S.C. §434 and §304 of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 284 (76). As set forth in detail by the Commission, in its Requests For Additional Information, sent to you on October 10, 1975, February 6, 1975 and March 25, 1975, your reports do not contain all the information required by 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of whether it should take action for your failure to file the required information. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Charles N. Steele (telephone no. 202/382-4055), the attorney assigned to this case.

Charles N. Steele

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

6C

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..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Committee to Elect Lyndon

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
438166

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
NOV - Stahl

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

NOV 26 1976

CSteele:pjg:10/20/76
cc: Chron file
MUR file
CS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

9 NOV 1976

Committee to Elect Lyndon LaRouche
P.O. Box 1972
G.P.O. New York, New York 10001

Re: MUR 281 (76)

Dear Sirs:

This letter is to notify you that the Federal Election Commission has concluded that it has reason to believe that you have failed to comply with the reporting requirements of 2 U.S.C. §434 and §304 of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 281 (76). As set forth in detail by the Commission, in its Requests for Additional Information, sent to you on October 10, 1975, February 6, 1975 and March 25, 1975, your reports do not contain all the information required by 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of whether it should take action for your failure to file the required information. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Charles N. Steele (telephone no. 202/382-4055), the attorney assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

66

1. The following service is requested (check one):

☒ Return to sender and date delivered _____

☐ Return to sender, date, & address of delivery _____

☐ RESTRICTED DELIVERY.
Show to whom and date delivered _____

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery _____

2. ARTICLE ASSIGNED TO:

*Comm to Elect Lyndon
LaRouche*

3. ARTICLE DESCRIPTION:

RECEIVED NO. *138207* RECEIVED NO. _____ RECEIVED NO. _____

4. I have examined the article described above.

SIGNATURE ☒ Address ☐ Authorized agent

Barbara Stalkin

5. DATE OF DELIVERY _____ POSTAGE _____

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER REASON:

NOV 10 1976

U.S. MAIL SERVICE

CSteele:pjg:11/1/76
cc: Chron file
MUR file
CS

3 3 1 0 3 7 1 3 2

AFFIDAVIT

Before me, the undersigned authority, personally appeared Orlando B. Potter, who being duly sworn, deposed, as follows:

1. I, Orlando B. Potter, am an employee of the Federal Government in the District of Columbia and am over the age of 21 years.

2. I am employed as Staff Director of the Federal Election Commission, pursuant to 2 U.S.C. 437c(f)(1), and in such capacity have access to and control and custody over the records of the Commission.

3. I have caused to have made a search of the records on file with the Federal Election Commission for all correspondence and all campaign finance statements and reports filed with the Federal Election Commission by Lyndon LaRouche and his principal campaign committee, the Committee to Elect Lyndon LaRouche, and mailed certified copies of all such materials to Mr. James Whisenand by letter of October 15, 1976.

4. The materials mailed to Mr. Whisenand on October 15, 1976 include all campaign finance statements and reports filed with the Federal Election Commission by Lyndon LaRouche and the Committee to Elect Lyndon LaRouche as of October 15, 1976.

5. Further deponent says not.

Date:

Oct. 19, 1976

Orlando B. Potter

Orlando B. Potter
Staff Director

Subscribed and sworn to before me this 19th day of

October, 1976.

Omiga E. Garrett
Notary Public

SEAL

15 OCT 1976

Ms. Marcia Merry
Chairman
Committee to Elect LaRouche
Post Office Box 1972
New York, New York 10001

Dear Ms. Merry:

Thank you for your letter of September 5, 1976, in which you express concern over a conference which the Federal Election Commission cosponsored with the Institute for Computer Sciences (ICS) of the National Bureau of Standards (NBS) on September 10, 1976. Please be advised that Title 2 of the United States Code, Section 438(b) mandates to the Federal Election Commission specific authority to conduct studies and publish reports on "voting and counting methods". This conference was a result of a study conducted by the Commission entitled, "Effective Use of Computer Technology in Vote - Tallying," a copy of which I have enclosed for your perusal.

Regarding your concern that the conference was conducted in a partial or partisan manner, I am advised that substantial efforts were devoted to soliciting the broadest possible range of views. For example, every election board responsible for administering Federal elections, whether or not they used computers, was invited to attend this conference. Many known opponents of computerized elections attended.

Invitations were extended on a totally nonpartisan basis, and I am advised that a specific invitation was made to a representative of your party on September 8, 1976, by Dr. Gary Greenhalgh of the Commission's Clearinghouse on Election Administration. I am further advised that no one from the U. S. Labor Party chose to attend.

Thank you for giving the Federal Election Commission this opportunity to be of assistance to you. If you have any additional inquiries, please do not hesitate to contact my office.

Sincerely,

Orlando S. Potter
Staff Director



FEDERAL ELECTION COMMISSION

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

October 15, 1976

Mr. James Whisenand
Deputy Attorney General
The Capitol
Tallahassee, Florida 32304

Attn: Arthur J. Towle/Charles Donahue

Dear Mr. Whisenand:

This letter is in response to your October 14, 1976 telegram requesting certified true copies of all correspondence between presidential candidate Lyndon LaRouche and the Federal Election Commission since 1972.

Enclosed with this letter please find several hundred pages of campaign finance statements and reports filed with the FEC from candidate Lyndon LaRouche and his principal campaign committee, Committee to Elect Lyndon LaRouche, under the Federal Election Campaign Act of 1971, as amended. These pages also include inquiries from the committee, FEC responses, and FEC Requests for Additional Information. These records cover the period from May 30, 1975 to the present. Prior to May 30, 1975 the presidential records were filed with the Comptroller General of the United States. These have now been received at the Commission and a review has indicated that they contain no records relating to LaRouche or his committee.

If you need additional explanations or materials, please do not hesitate to contact me or our General Counsel John G. Murphy, Jr.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

OBP/KCC
Enclosures



Telegram

LLC055 WAB097(1133)(2-019406E287)PD 10/13/76 1133

ICS IPMMTZZ CSP

1976 OCT 13 PM 12 054

9044882472 IDMT TALLAHASSEE FL 145 10-13 1133A EST
PMS KEN COOPER, CARE FEDERAL ELECTIONS COMMISSION, DLR
1325 K ST NORTHWEST
WASHINGTON DC 20463

762871

RE OUR TELEPHONE CONVERSATION TODAY

IN CONNECTION WITH OUR APPEAL BEFORE THE FEDERAL DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA RE LYNDON LAROCHE VERSUS GOVERNOR
RUBIN ASKEW, FLORIDA DEPARTMENT OF LEGAL AFFAIRS URGENTLY REQUIRES
CERTIFIED TRUE COPIES OF ALL CORRESPONDENCE BETWEEN PRESIDENTIAL
CANDIDATE LYNDON LAROCHE AND THE FEDERAL ELECTIONS COMMISSION SINCE
1972. THIS DEPARTMENT ALSO SPECIFICALLY REQUIRES DATA ON

1 ALL CAMPAIGN CONTRIBUTIONS TO AN EXPENDITURES REPORTED BY LAROCHE
OR THE COMMITTEE TO ELECT LAROCHE;

2 A LIST OF ALL FLORIDA RESIDENTS, AND THEIR ADDRESSES, WHO HAVE

SF-1201 (RS-63)

CONTRIBUTED TO LAROCHE

3 ALL EXPENDITURES MADE BY LAROCHE OR THE COMMITTEE TO ELECT
LAROCHE IN THE STATE OF FLORIDA.

THIS INFORMATION IS REQUIRED AS SOON AS POSSIBLE. WE THEREFORE
REQUEST THAT IT BE FORWARDED COLLECT BY COMMERCIAL AIRLINE BY WAY OF
THE EASTERN SPRINT SERVICE.

DEPUTY ATTORNEY GENERAL JAMES WHISENAND ATTORNEY GENERAL'S
OFFICE THE CAPITOL TALLAHASSEE FL 32304

NNNN

SF-1201 (RS-63)

Lyndon LaRouche for President

Wayne Evans for Vice President

762879

Federal Communications Commission
Attn: William B. Ray, Chief
Complaints and Compliance Division
Washington, D.C. 20554

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001
Telephone: (212) 563-8600
Marcia Merry, Chairman
Richard Welsh, Treasurer

October 12, 1976
via Registered Mail

Dear Mr. Ray:

On behalf of U.S. Labor Party candidate for President of the United States Lyndon H. LaRouche, Jr., who is a legally qualified candidate as shown in documentation sent you, we register this complaint of violation of Section 315 (a) et. seq. of the Communications Act, to wit:

Insofar as the so-called presidential debates sponsored by the League of Women Voters Education Fund are being treated by the major networks (ABC, CBS, NBC, NET) as news events, contrary to all precedent and contrary to the usual definition, and insofar as the October 6 debate between Mr. Carter and President Ford has raised the "controversial issue" of conditions under which the United States Government would engage in thermonuclear war with the consequent annihilation of the majority of the population of the United States, we demand that the Federal Communications Commission intervene to enforce the "fairness doctrine" provisions in the letter and spirit of Section 315 to grant Mr. LaRouche "equal opportunity" to present an opposing view on all networks prior to the November 2 general election- of 1976.

No charge that, since the spectre of imminent thermonuclear war has been raised before an estimated 90 million Americans, this constitutes a "controversial issue" of overriding concern to the public interest, and indeed, constitutes "a clear and present danger", and that the FCC has an obligation to mitigate both the violation of fairness doctrine cited, and as indirectly mandated by the U.S. Constitution, to mitigate this danger by immediately facilitating presentation of alternative views on the matter.

Not only is Mr. LaRouche a legally qualified candidate in states having a majority of the Electoral College vote, he is viewed by official representatives of other nations as the most qualified person to address these issues. In the August session of the Sri Lanka Conference of 77 Non-Aligned Nations, delegates referred to LaRouche as "The Great American". There and at the United Nations, official speeches endorsing Mr. LaRouche's plan for a New World Economic Order were presented explicitly as alternative to nuclear war.

Continued...

Vote U.S. Labor Party 1976

Mr. Wm. Ray, Federal Communications Comm.

page 2.

While we do not seek to prevent future debates between President Ford and others, we most strongly feel that just enforcement of the "fairness doctrine" would be served by FCC intervention into these debates for the purpose of ensuring LaRouche's inclusion, or, that the FCC order the networks to provide appropriate time for Mr. LaRouche's alternative views to reach a substantial proportion of those viewers who witnessed the "controversial issue" of nuclear war raised on October 6.

In view of the extraordinary concern to the public interest, we request immediate, and if necessary, extraordinary action on this complaint. We are prepared to immediately present our case before a special session of an executive or other appropriate body of the FCC.

Sincerely,

Robert Gibbons

Robert Gibbons
Committee to Elect LaRouche

Note: This complaint of today, October 12, 1976 is separate from and additional to that of August 18, 1976 sent by Ms. Spida.RG

CC: Federal Election Commission
The White House, Washington, D.C.

DATE AND TIME OF TRANSMITTAL: 10-27-76

NO. MUR 281 (76)

REC'D: _____

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Internally Generated

Respondent's Name: Committee to Elect Lyndon LaRouche

Relevant Statute: 2 U.S.C. §434(b)

Internal Reports Checked: None

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

Respondent has failed to disclose in its reports the names and addresses and the occupation and principal place of business of contributors. Requests for additional information (RAIs) (11/10/75; 2/6/75/ 3/25/76) have gone unfulfilled. On March 12, 1976, the Commission denied a request, received February 23, 1976, for a hearing to secure an exemption from the disclosure requirements of FECA on the grounds that it was outside the scope of the Commission's authority.

PRELIMINARY LEGAL ANALYSIS

Respondent implicatly acknowledges that their non-reporting is contrary to the requirements of 2 U.S.C. §434 and will presumably protest any attempt to take action against them on the grounds, alluded to in their February request, that revelation of contributors names is unconstitutional and has and will lead to harassment of them. In such circumstances, it seems clear that the Commission has reason to believe that the statute has been violated,

(See continuation sheet)

RECOMMENDATION

Keep file open; find reason to believe, send attached letters.

Date of Next Commission Review: _____

CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

and should so find. The statute then gives respondent the "opportunity to demonstrate that no action should be taken against" it; at that stage the Commission will have to determine whether the evidence offered shows "a reasonable probability that the compelled disclosure of a party's contributors' names will subject them to threats, harassment or reprisals from either government officials or private parties." (Buckley v. Valeo, S. Ct. slip opinion, p. 68). If there is evidence to support the claim, the Commission will have to decide whether or not to take further action.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Committee to Elect Lyndon LaRouche
P.O. Box 1972
G.O.P. New York, NY 10001

Re: MUR 281 (76)

Dear Sirs:

This letter is to notify you that the Federal Election Commission has concluded that it has reason to believe that you have failed to comply with the reporting requirements of 2 U.S.C. §434 and §304 of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 228 (76). As set forth in detail by the Commission, in its Requests For Additional Information, sent to you on October 10, 1975, February 6, 1975 and March 25, 1975, your reports do not contain all the information required by 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of whether it should take action for your failure to file the required information. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Charles N. Steele (telephone no. 202/382-4055), the attorney assigned to this case.



This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

100-406700336

15 OCT 1976

Ms. Marcia Merry
Chairman
Committee to Elect LaRouche
Post Office Box 1972
New York, New York 10001

Dear Ms. Merry:

Thank you for your letter of September 5, 1976, in which you express concern over a conference which the Federal Election Commission cosponsored with the Institute for Computer Sciences (ICS) of the National Bureau of Standards (NBS) on September 10, 1976. Please be advised that Title 2 of the United States Code, Section 438(b) mandates to the Federal Election Commission specific authority to conduct studies and publish reports on "voting and counting methods". This conference was a result of a study conducted by the Commission entitled, "Effective Use of Computer Technology in Vote - Tallying," a copy of which I have enclosed for your perusal.

Regarding your concern that the conference was conducted in a partial or partisan manner, I am advised that substantial efforts were devoted to soliciting the broadest possible range of views. For example, every election board responsible for administering Federal elections, whether or not they used computers, was invited to attend this conference. Many known opponents of computerized elections attended.

Invitations were extended on a totally nonpartisan basis, and I am advised that a specific invitation was made to a representative of your party on September 8, 1976, by Dr. Gary Greenhalgh of the Commission's Clearinghouse on Election Administration. I am further advised that no one from the U. S. Labor Party chose to attend.

Thank you for giving the Federal Election Commission this opportunity to be of assistance to you. If you have any additional inquiries, please do not hesitate to contact my office.

Sincerely,

Orlando B. Potter
Staff Director



U.S. Labor Party

P.O. BOX 1972 • NEW YORK, N.Y. 10001 • TELEPHONE (212) 563-8600

September 5, 1976

76 SEP 8 P 1:13

Mr. Vernon Thomson
Chairman
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Mr. Thomson:

762070

This letter is an urgent appeal that the Federal Election Commission intervene immediately to remedy a clearly partisan one-sided, dangerous and incompetent symposium on Computerized Elections which it is sponsoring on September 10 together with the National Bureau of Standards' Institute for Computer Sciences and Technology.

The symposium, entitled "Assuring the Consent of the Governed: Managing Computerized Elections" is being advertised as a symposium for congressional and local elected officials considering computer election systems held under the sponsorship of the Federal Election Commission, the government agency entrusted with carrying out fair elections. The symposium's very title suggests the high impropriety involved in the FEC's sponsorship because the FEC's mandate gives it no jurisdiction to assure the consent of the governed to any procedure. The FEC's sponsorship of such a symposium on computer election systems furthermore suggests that there is no urgent and serious danger of vote fraud -- a completely unjustified assertion judging from the reports of counties which have used computer election systems (see Los Angeles Times, August 18, 1976, and testimony given at Missouri State Legislative Committee Hearings held in St. Louis County on August 24 and Kansas City County on August 30, 1976, for only the most recent public objections to the use of the system.).

The scheduled symposium's exclusion of election officials from counties which have experimented with the computer election system and rejected it, such as Houston, is as well a serious omission. The symposium's eight tutorials are being conducted by public officials who are convinced that computers are to one degree or another usable. There is no presentation of the overwhelming body of evidence that computerized elections cannot be safeguarded from vote fraud.

It is a matter of public record that International Business Machines (IBM) controls approximately 90% of the computer election market through its spinoff Computer Election Systems (CES), and is presently in a position to shut out AVM and Shoup lever machine companies by reselling their traded-in equipment at a substantial discount.

This fact is extremely significant when it is realized that the select few who will completely understand computerized election processes will overwhelmingly be employees controlled by IBM. IBM's vast connections to international private intelligence agencies such as Interpol and the International Association of Chiefs of Police (IACP) are wellknown. IBM's intelligence agency connections strongly suggest that the potentialities for vote fraud inherent in a system which is complex, versatile and beyond the understanding of the ordinary voter would be realized.

The November elections, the most important in this nation's history, make the premature introduction of computer systems a grave danger. The FEC, in its mandate to investigate interference against electoral campaigns, should launch a full investigation of computerized voting immediately, rather than sponsor a promotional seminar whose effect would be to entrust elections to a private corporation tied to intelligence agencies.

The deliberate exclusion of views opposing computerized elections suggests strongly that persons in the FEC and related agencies are bent on suggesting that the FEC endorses computers despite the serious opposition raised wherever they have been introduced. For example, Institute for Computer Sciences and Technology official Ms. Shirley Radek told a U.S. Labor Party spokesman last week "We are all for computers." Challenged to present both sides of the issue, Ms. Radek said: "We don't have to. President Ford doesn't present both sides of the issues."

The highly improper suggestion that the FEC endorses the use of computerized elections in the face of blatant fraud mandates that the FEC take immediate action to rectify this impression. The FEC must inform symposium participants that the FEC is in no way convinced that computerized vote systems can be safely introduced at this time until further investigations have been completed. Secondly, the FEC should move immediately to balance its tutorials with presentations from parties opposed to the use of computers. The U.S. Labor Party is available to testify on this question, as well as several elected officials in Missouri who used computerized vote counting in their August 3 primary, including Kansas City Councilman Bruce Watkins and Missouri State Senator Franklin Payne. This testimony would balance the uniform presentations by proponents of computerized elections who differ only in degrees.

We would regret having to go to court to seek relief from the public actions of a supposedly non-partisan regulatory agency. Please contact us at once by telephone to discuss our proposals.

Sincerely,

Marcia Merry

Ms. Marcia Merry
Chairman of the Committee to Elect LaRouche

cc: Mr. Richard Cheney, White House
Missouri State Senator Franklin Payne
Kansas City Councilman Bruce Watkins

Lyndon LaRouche for President

Wayne Evans for Vice President

762879

Federal Communications Commission
Attn: William B. Ray, Chief
Complaints and Compliance Division
Washington, D.C. 20554

RECEIVED
76 OCT 15
Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001
Telephone: (212) 563-8600
Marcia Merry, Chairman
Richard Welsh, Treasurer

October 12, 1976
via Registered Mail

Dear Mr. Ray:

On behalf of U.S. Labor Party candidate for President of the United States Lyndon H. LaRouche, Jr., who is a legally qualified candidate as shown in documentation sent you, we register this complaint of violation of Section 315 (a) et. seq. of the Communications Act, to wit:

Insofar as the so-called presidential debates sponsored by the League of Women Voters Education Fund are being treated by the major networks (ABC, CBS, NBC, NET) as news events, contrary to all precedent and contrary to the usual definition, and insofar as the October 6 debate between Mr. Carter and President Ford has raised the "controversial issue" of conditions under which the United States Government would engage in thermonuclear war with the consequent annihilation of the majority of the population of the United States, we demand that the Federal Communications Commission intervene to enforce the "fairness doctrine" provisions in the letter and spirit of Section 315 to grant Mr. LaRouche "equal opportunity" to present an opposing view on all networks prior to the November 2 general election- of 1976.

We charge that, since the spectre of imminent thermonuclear war has been raised before an estimated 90 million Americans, this constitutes a "controversial issue" of overriding concern to the public interest, and indeed, constitutes "a clear and present danger", and that the FCC has an obligation to mitigate both the violation of fairness doctrine cited, and as indirectly mandated by the U.S. Constitution, to mitigate this danger by immediately facilitating presentation of alternative views on the matter.

Not only is Mr. LaRouche a legally qualified candidate in states having a majority of the Electoral College vote, he is viewed by official representatives of other nations as the most qualified person to address these issues. In the August session of the Sri Lanka Conference of 77 Non-Aligned Nations, delegates referred to LaRouche as "The Great American". There and at the United Nations, official speeches endorsing Mr. LaRouche's plan for a New World Economic Order were presented explicitly as alternative to nuclear war.

Continued...

Vote U.S. Labor Party 1976

While we do not seek to prevent future debates between President Ford and others, we most strongly feel that just enforcement of the "fairness doctrine" would be served by FCC intervention into these debates for the purpose of ensuring LaRouche's inclusion, or, that the FCC order the networks to provide appropriate time for Mr. LaRouche's alternative views to reach a substantial proportion of those viewers who witnessed the "controversial issue" of nuclear war raised on October 5.

In view of the extraordinary concern to the public interest, we request immediate, and if necessary, extraordinary action on this complaint. We are prepared to immediately present our case before a special session of an executive or other appropriate body of the FCC.

Sincerely,



Robert Gibbons
Committee to Elect LaRouche

Note: This complaint of today, October 12, 1976 is separate from and additional to that of August 18, 1976 sent by Ms. Spida.RG

CC: Federal Election Commission
The White House, Washington, D.C.

WTF

1 2 MAR 1976

Mr. Richard Welch
Treasurer, U. S. Labor Party
Ms. Marcia Merry, Chairman
Committee to Elect LaRouche-Evans
P. O. Box 1972, GPO
New York, New York 10001

Dear Mr. Welch and Ms. Merry:

This letter is in response to correspondence received from you on February 23 and March 2, 1976.

The first letter requests a hearing to determine whether the U.S. Labor Party may be exempted from disclosure of the names and addresses of its contributors under the provisions of the Federal Election Campaign Act of 1971, as amended (the Act). Your second letter indicates your intention to file a report of receipts and expenditures omitting the identification of your contributors.

The Commission has directed me to inform you that no hearing may be afforded, under the Commission's existing authority, to grant the relief you seek. See 2 U.S.C. §§434, 436, 437d, and 433. The Court in Buckley v. Valeo indicates that a court may grant relief in an appropriate case but in no way intimates that the Commission has such authority. 44 U.S.L.W. 4127 at 4146-4152 (S.C. January 30, 1976). In sum, while the Commission is sensitive to the problems of small parties, it is of the view that it is not currently empowered to provide the remedy you seek. I must, therefore, remind you that the provisions of 2 U.S.C. §434(b)(2) require that the name, address, occupation and principal place of business of each donor of an amount in excess of \$100 be reported to the Commission.

- 2 -

I trust that, in light of the foregoing, you will reevaluate the position taken in your most recent letter.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

rew:JGMurphy:mpc:3/11/76

cc: JGM
GS

Lyndon LaRouche for President

Wayne Evans for Vice President

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001

Marcia Merry, Chairman
Richard Welsh, Treasurer

John Murphy,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: ADZ-1975-108

RE: Committee to Elect Lyndon LaRouche
U.S. Labor Party
Affiliated state Labor Party organizations

Dear Mr. Murphy:

As provided for by the recent Supreme Court decision on the FEC (Buckley v. Valeo, pp. 59-69), we are applying for a hearing to determine our exemption from the disclosure requirements of the Federal Election Reform Act of 1971. In a conversation with Commission offices, Mr. Foster of our staff was informed that a letter such as this is sufficient in seeking such a hearing.

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We are prepared to provide reasonable proof of massive harassment of Labor Party members and supporters, which will demonstrate beyond any reasonable doubt that contributors whose names are disclosed are likely to suffer similar harassment.

The present level of harassment of U.S. Labor Party organizing is extraordinarily high, with 174 incidents reported during the week of Feb. 8-14.

Much of the evidence which is in the form suitable for litigation has been incorporated into at least 24 civil suits filed in various courts around the country on behalf of U.S. Labor Party members or the organization. Included in these are suits charging conspiracies by local police officials and/or the FBI to deprive Labor Party members of their civil rights, and suits charging interference in election campaigns and elections proper.

Vote U.S. Labor Party 1976

Of particular interest to you would be the following cases:

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US. District Court for the Eastern District of Michigan,
74-72019.

United States Labor Party v. City of Reading, FBI, ATF,
US. District Court for Eastern District of Pa., 75-2704.

NCLC v. Anthony Banks and FBI, U.S. District Court for
New Jersey, 75-1536.

LaRouche v. Kelley, Levi, and FBI, US. District Court for
the Southern District of New York, 75-6010, suited filed
under Freedom of Information Act seeking disclosure and
challenging continuing COINTELPRO activities.

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Court for Western District of Washington.

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District of New York, 75-6009, suit seeking disclosure and
charging harassment by State and N.Y. City police.

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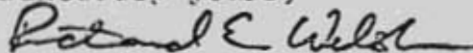
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the Northern District of Ohio, Western Division, suit
against Perrysburg police and UAW officials for civil
rights violations.

We will be happy to make available to you pleadings from
these cases as well as other documentation of harassment.

Sincerely yours,



Richard Welch
Treasurer, U.S. Labor Party

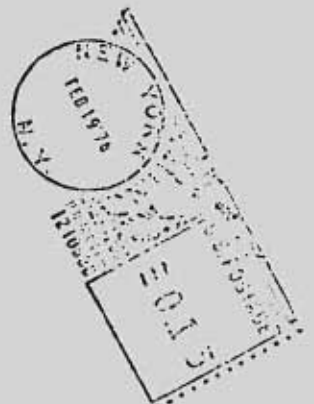

Marcia Merry, Chairman
Committee to Elect LaRouche-Evans

U.S. Labor Party
P.O. Box 1972
GPO
New York, N.Y.

10001
FEDERAL ELECTION COMMISSION

76-1023 P3:19

Mr. John Murphy
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



U.S. Labor Party

P.O. BOX 1972 • NEW YORK, N.Y. 10011 • TELEPHONE (212) 563-8600

September 5, 1976

76 SEP 8 P 1:13

Mr. Vernon Thomson
Chairman
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Mr. Thomson:

762070

This letter is an urgent appeal that the Federal Election Commission intervene immediately to remedy a clearly partisan one-sided, dangerous and incompetent symposium on Computerized Elections which it is sponsoring on September 10 together with the National Bureau of Standards' Institute for Computer Sciences and Technology.

The symposium, entitled "Assuring the Consent of the Governed: Managing Computerized Elections" is being advertised as a symposium for congressional and local elected officials considering computer election systems held under the sponsorship of the Federal Election Commission, the government agency entrusted with carrying out fair elections. The symposium's very title suggests the high impropriety involved in the FEC's sponsorship because the FEC's mandate gives it no jurisdiction to assure the consent of the governed to any procedure. The FEC's sponsorship of such a symposium on computer election systems furthermore suggests that there is no urgent and serious danger of vote fraud -- a completely unjustified assertion judging from the reports of counties which have used computer election systems (see Los Angeles Times, August 18, 1976, and testimony given at Missouri State Legislative Committee Hearings held in St. Louis County on August 24 and Kansas City County on August 30, 1976, for only the most recent public objections to the use of the system.).

The scheduled symposium's exclusion of election officials from counties which have experimented with the computer election system and rejected it, such as Houston, is as well a serious omission. The symposium's eight tutorials are being conducted by public officials who are convinced that computers are to one degree or another usable. There is no presentation of the overwhelming body of evidence that computerized elections cannot be safeguarded from vote fraud.

It is a matter of public record that International Business Machines (IBM) controls approximately 90% of the computer election market through its spinoff Computer Election Systems (CES), and is presently in a position to shut out AVH and Shoup lever machine companies by reselling their traded-in equipment at a substantial discount.

This fact is extremely significant when it is realized that the select few who will completely understand computerized election processes will overwhelmingly be employees controlled by IBM. IBM's vast connections to international private intelligence agencies such as Interpol and the International Association of Chiefs of Police (IACP) are wellknown. IBM's intelligence agency connections strongly suggest that the potentialities for vote fraud inherent in a system which is complex, versatile and beyond the understanding of the ordinary voter would be realized.

The November elections, the most important in this nation's history, make the premature introduction of computer systems a grave danger. The FEC, in its mandate to investigate interference against electoral campaigns, should launch a full investigation of computerized voting immediately, rather than sponsor a promotional seminar whose effect would be to entrust elections to a private corporation tied to intelligence agencies.

The deliberate exclusion of views opposing computerized elections suggests strongly that persons in the FEC and related agencies are bent on suggesting that the FEC endorses computers despite the serious opposition raised wherever they have been introduced. For example, Institute for Computer Sciences and Technology official Ms. Shirley Radek told a U.S. Labor Party spokesman last week "We are all for computers." Challenged to present both sides of the issue, Ms. Radek said: "We don't have to. President Ford doesn't present both sides of the issues."

The highly improper suggestion that the FEC endorses the use of computerized elections in the face of blatant fraud mandates that the FEC take immediate action to rectify this impression. The FEC must inform symposium participants that the FEC is in no way convinced that computerized vote systems can be safely introduced at this time until further investigations have been completed. Secondly, the FEC should move immediately to balance its tutorials with presentations from parties opposed to the use of computers. The U.S. Labor Party is available to testify on this question, as well as several elected officials in Missouri who used computerized vote counting in their August 3 primary, including Kansas City Councilman Bruce Watkins and Missouri State Senator Franklin Payne. This testimony would balance the uniform presentations by proponents of computerized elections who differ only in degrees.

We would regret having to go to court to seek relief from the public actions of a supposedly non-partisan regulatory agency. Please contact us at once by telephone to discuss our proposals.

Sincerely,

Marcia Merry

Ms. Marcia Merry

Chairman of the Committee to Elect LaBouche

cc: Mr. Richard Cheney, White House
Missouri State Senator Franklin Payne
Kansas City Councilman Bruce Watkins

WTF

1 2 MAR 1976

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Treasurer, U. S. Labor Party
Ms. Marcia Merry, Chairman
Committee to Elect LaRouche-Evans
P. O. Box 1972, GPO
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- 2 -

I trust that, in light of the foregoing, you will
reevaluate the position taken in your most recent letter.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.
General Counsel

13717000
rew:JGMurphy:mpc:3/11/76

cc: JGM
GS

12 MAR 1976

Mr. Richard Welch
Treasurer, U. S. Labor Party
Ms. Marcia Merry, Chairman
Committee to Elect LaRouche-Evans
P. O. Box 1972, GPO
New York, New York 10001

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General Counsel

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cc: JGM
GS

Lyndon LaRouche for President

Wayne Evans for Vice President

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001

Marcia Merry, Chairman
Richard Welsh, Treasurer

John Murphy,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: ADP 1975-108

RE: Committee to Elect Lyndon LaRouche
U.S. Labor Party
Affiliated state Labor Party organizations

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Much of the evidence which is in the form suitable for litigation has been incorporated into at least 34 civil suits filed in various courts around the country on behalf of U.S. Labor Party members or the organization. Included in these are suits charging conspiracies by local police officials and/or the FBI to deprive Labor Party members of their civil rights, and suits charging interference in election campaigns and elections proper.

Vote U.S. Labor Party 1976

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Richard Welch
Treasurer, U.S. Labor Party

Marcia Merry
Marcia Merry, Chairman
Committee to Elect LaRouche-Evans

U.S. Labor Party
P.O. Box 10712
New York, N.Y.

70-3323 P.3:19

John Murphy
Federal Bureau of Investigation
Washington, D.C.

RECEIVED
F.B.I.
JAN 10 1970
U.S. DEPT. OF JUSTICE

100-37723

Lyndon LaRouche for President

Wayne Evans for Vice President

Committee to Elect Lyndon LaRouche
P.O. Box 1972, G.P.O. New York, N.Y. 10001

Marcia Merry, Chairman
Richard Welsh, Treasurer

John Murphy,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

D: A012-1975-108

RE: Committee to Elect Lyndon LaRouche
U.S. Labor Party
Affiliated state Labor Party organizations

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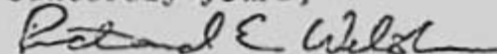
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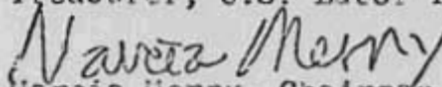
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Richard Welch
Treasurer, U.S. Labor Party



Marcia Merry, Chairman
Committee to Elect LaRouche-Evans

U.S. Labor Party
P.O. Box 1972
GPO
New York, N.Y.

100th CONGRESS
FEDERAL ELECTION
COMMISSION

70-1023 P3:19

Mr. John Murphy
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1352

Date Filmed 1-6-83 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1352 Depositions

Date Filmed 1-6-83 Camera No. --- 2

Cameraman APC

JB/je

BEFORE THE FEDERAL ELECTION COMMISSION

-----X

In the Matter of :

The Committee to Elect LYNDON : MUR 398(77)
LaROUCHE

:
-----X

DEPOSITION of RICHARD WELSH, held at 231

West 29th Street, New York, New York, on
Thursday, the 16th day of February, 1978,
commencing at 11:00 o'clock a.m., before Jean
Brdey, a Shorthand (Stenotype) Reporter and
Notary Public within and for the State of New
York.

* * *

RALPH FINK & ASSOCIATES, INC.

Certified Stenotype Reporters

Official Reporters

140 NASSAU STREET

NEW YORK, N.Y. 10038

REctor 2-5566

A P P E A R A N C E S :

FEDERAL ELECTION COMMISSION
1325 K Street Northwest
Washington, D.C.

BY: BIZ VAN GELDER, Esq., of Counsel
LESTER N. SCALL, Esq., of Counsel

GREGORY J. PERRIN, Esq.
Attorney for Respondent
225 Broadway
New York, New York

PRESENT:

RENEE TOPOLDOS

* * *

1

2

R I C H A R D W E L S H, called as a witness, having
3 been first duly sworn by Ms. Van Gelder, was
4 examined and testified as follows:

5

BY MR. SCALL:

6

Q State your name, please, and spell it.

7

A Richard Welsh, W-e-l-s-h.

8

Q What is your address?

9

A 709 West 176th Street, New York, New York.

10

Q What is your occupation now, Mr. Welsh?

11

MR. PERRIN: I direct you not to answer
12 on the grounds that the question is violative
13 of your First and Fifth Amendment rights.

14

You now say that you decline to answer on
15 the advice of counsel.

16

A I decline to answer on advice of counsel.

17

Q Mr. Welsh, are you familiar with, or have you

18

had any association with the Committee to Elect Lyndon

19

LaRouche?

20

MR. PERRIN: I direct you not to answer
21 on the same grounds.

22

Please make the same answer.

23

A I decline to answer on the advice of counsel.

24

Q Are you familiar with, or have you ever been

25

connected with the National Conference of Labor Committees?

MR. PERRIN: I direct you not to answer on the same grounds, and please make the same answer.

Q National Caucus of Labor Committees.

A I decline to answer on advice of counsel.

Q Are you familiar with, or have you ever been associated with the United States Labor Party?

MR. PERRIN: I direct you not to answer on the same grounds, and please make the same answer.

A I decline to answer on the advice of counsel.

Q Are you familiar with, or have you ever been associated with Campaigner Publications?

MR. PERRIN: I direct you not to answer on the same grounds.

Please make the same answer.

A I decline to answer on advice of counsel.

Q Are you familiar with, or have you ever been associated with New Solidarity?

MR. PERRIN: I direct you not to answer on the same grounds.

Please make the same answer.

A I decline to answer on advice of counsel.

Q Mr. Welsh, have you ever been the Treasurer of

1 the United States Labor Party?

2 MR. PERRIN: I direct you not to answer
3 on the same grounds, and please make the same
4 answer.
5

6 A I decline to answer on advice of counsel.

7 Q Have you ever been the Treasurer of the
8 Committee to Elect Lyndon LaRouche?

9 MR. PERRIN: I direct you not to answer
10 on the same grounds.

11 Please make the same answer.

12 A I decline to answer on the advice of counsel.

13 Q Do you know who the Treasurer of the Committee
14 to Elect Lyndon LaRouche was?

15 MR. PERRIN: I direct you not to answer
16 on the same grounds.

17 Please make the same answer.

18 A I decline to answer on the advice of counsel.

19 Q Do you know who the Treasurer of the U.S.
20 Labor Party was or is?

21 MR. PERRIN: I direct you not to answer
22 on the same grounds.

23 Please make the same answer.

24 A I decline to answer on advice of counsel.

25 Q Mr. Welsh, I am going to show you a document

1
2 consisting of eight pages which purports to be a report
3 from the Committee to Elect Lyndon LaRouche to the Federal
4 Election Commission and ask if you can identify the
5 signature on the bottom of the page 1, which purports to
6 be that of Richard Welsh, as your signature?

7 MR. PERRIN: I direct you not to answer
8 on the same grounds.

9 I ask you please to make the same answer
10 to the stenographer.

11 A I decline to answer on the advice of counsel.

12 MR. SCALL: I am going to offer this
13 document as Federal Election Commission Exhibit
14 1.

15 It is further to be identified as a report
16 dated or stamped "Received by the Federal
17 Election Commission, February 24, 1977."

18 MR. PERRIN: I have no objection to your
19 marking it for identification.

20 As to marking it in evidence, and using
21 that term very restrictively, I do not
22 acknowledge the accuracy of the statement under
23 any circumstances.

24 It bears a stamp received by your office,
25 but I do not vouch for its accuracy, who

1
2 prepared it, where it came from, or the fact
3 that it was ever received by you.

4 MR. SCALL: I understand.

5 (A report stamped "Received by the
6 Federal Election Commission, February 24, 1977"
7 was marked as FEC Exhibit 1, for identification,
8 as of this date.)

9 BY MR. SCALL:

10 Q Mr. Welsh, I am going to show you a two-page
11 document which appears to be a report to the Federal
12 Election Commission from the U.S. Labor Party.

13 On the bottom of Page 1 there appears to be a
14 signature of the name Richard E. Welsh, and ask you if you
15 identify it.

16 MR. PERRIN: I direct you not to answer
17 on the same grounds, and I ask you please to
18 make that same answer to the stenographer.

19 A I decline to answer on advice of counsel.

20 MR. SCALL: For the record, further, this
21 report is identified as covering the period
22 October 18th through November 22, 1976 and
23 stamped "Received by the Federal Election
24 Commission, February 24, 1977" and I offer this
25 as Commission Exhibit 2.

1
2 MR. PERRIN: On any documentation, let us
3 state for the record, I don't mind your identify-
4 ing them, but as to their being marked in
5 evidence in some proceeding, I would object.

6 For identification, fine.

7 (A two-page document appearing to be a
8 report to the Federal Election Commission from
9 the U.S. Labor Party was marked as FEC Exhibit
10 2, for identification, as of this date.)

11 BY MR. SCALL:

12 Q Mr. Welsh, I have a group of three more
13 documents which purport to be reports from the U.S. Labor
14 Party filed with the Federal Election Commission.

15 The documents are of varying number of pages.

16 At the bottom of Page 1 on each of the three
17 documents there is a signature which appears to be that of
18 Richard E. Welsh.

19 I am going to show you these three documents
20 and ask you if you can identify the signature or the
21 document?

22 MR. PERRIN: I direct you not to answer
23 on the same grounds, and please make the same
24 answer to the stenographer.

25 A I decline to answer on the advice of counsel.

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2 MR. PERRIN: I have no objection to these
3 being marked collectively.

4 MR. SCALL: I offer these as Commission
5 Exhibit No. 3.

6 (A group of three documents purporting to
7 be reports of the U.S. Labor Party filed
8 with the Federal Election Commission was marked
9 as FEC Exhibit 3, for identification, as of
10 this date.)

11 BY MR. SCALL:

12 Q Mr. Welsh, I am going to show you a two-page
13 document which is entitled "National Broadcasting Company,
14 Inc., TV Network, Political Broadcast Order and Contract."

15 There are initials at the top of Page 1 that
16 appear to be "REW" and a signature at the bottom of Page 2
17 that appears to be Richard E. Welsh.

18 Immediately above it again are the initials
19 "REW."

20 I am going to ask you if you can identify this
21 document and the signatures and initials on them?

22 MR. PERRIN: I direct you not to answer on
23 the same grounds.

24 A I decline to answer on the advice of counsel.

25 MR. SCALL: I offer this as the next

1 consecutive Commission Exhibit.

2 (A two-page document entitled "National
3 Broadcasting Company, Inc., TV Network,
4 Political Broadcast Order and Contract,"
5 was marked as FEC Exhibit 4, for identification,
6 as of this date.)
7

8 BY MR. SCALL:

9 Q I am going to show you a one-page document
10 headed up with the caption "National Broadcasting Company
11 Adjustment Billing," and ask you if you can identify, or
12 are you familiar with this document?

13 MR. PERRIN: I direct you not to answer
14 on the same grounds.

15 A I decline to answer on advice of counsel.

16 MR. SCALL: I offer this document as the
17 next Commission Exhibit.

18 (A one-page document headed "National
19 Broadcasting Company Adjustment Billing" was
20 marked as FEC Exhibit 5, for identification, as
21 of this date.)

22 BY MR. SCALL:

23 Q Mr. Welsh, are you familiar with fund raising
24 events run by the Committee to Elect Lyndon LaRouche?

25 MR. PERRIN: I direct you not to answer

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on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who would be familiar with fund raising events of the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who handled expenditures made by the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Are you familiar with expenditures made by the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Are you familiar with loans taken out by the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who might be familiar with loans taken out by the Committee to Elect Lyndon LaRouche?

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2 MR. PERRIN: I direct you not to answer
3 on the same grounds.

4 A I decline to answer on advice of counsel.

5 Q Are you familiar with, or have you had any
6 contact with transfers of funds from the Committee to Elect
7 Lyndon LaRouche to the National Caucus of Labor Committees?

8 MR. PERRIN: I direct you not to answer
9 on the same grounds.

10 A I decline to answer on advice of counsel.

11 Q Do you know who might have information concerning
12 transfers of monies from Committee to Elect Lyndon LaRouche
13 to the National Caucus of Labor Committees?

14 MR. PERRIN: I direct you not to answer on
15 the same grounds.

16 A I decline to answer on advice of counsel.

17 Q Are you familiar with a thirty-minute television
18 broadcast on the eve of election night in 1976 at which
19 time Lyndon LaRouche spoke?

20 MR. PERRIN: I direct you not to answer on
21 the same grounds.

22 A I decline to answer on advice of counsel.

23 MR. PERRIN: And also on that particular
24 question, too, I would also indicate that the
25 question is ultra vires of the Commission.

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Q Are you familiar with the operations of field offices of the Committee to Elect Lyndon LaRouche in the U.S. Labor Party?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

Q Are you familiar with the submission of the request for matching funds for the campaign of Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who would be familiar with such submission?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who was authorized to write checks for the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who was authorized to write checks for the U.S. Labor Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know what the relationship was between,
if any, between the U.S. Labor Party and the Committee to
Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who made deposits to the bank
account of the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who made deposits to the bank
account of the U.S. Labor Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

MS. VAN GELDER: Excuse us a second.

(Discussion off the record.)

BY MR. SCALL:

Q Mr. Welsh, did you make deposits for the
Committee to Elect Lyndon LaRouche?

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2 MR. PERRIN: I direct you not to answer
3 on the same grounds.

4 A I decline to answer on advice of counsel.

5 Q Did you make deposits for the U.S. Labor Party?

6 MR. PERRIN: I direct you not to answer
7 on the same grounds.

8 A I decline to answer on advice of counsel.

9 Q Did you write checks for the Committee to
10 Elect Lyndon LaRouche?

11 MR. PERRIN: I direct you not to answer
12 on the same grounds.

13 A I decline to answer on advice of counsel.

14 Q Did you write checks for the U.S. Labor Party?

15 MR. PERRIN: I direct you not to answer
16 on the same grounds.

17 A I decline to answer on advice of counsel.

18 Q Mr. Welsh, did you write checks for the
19 National Caucus of Labor Committees?

20 MR. PERRIN: I direct you not to answer
21 on the same grounds.

22 A I decline to answer on advice of counsel.

23 Q Mr. Welsh, I am going to show you a one-page
24 document which appears to be a photocopy, front and back,
25 of a check.

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The check is entitled -- apparently from the account of National Caucus of Labor Committees and appears to have the signature of a Richard E. Welsh.

I am going to ask you if you can identify that document and the signature?

MR. PERRIN: I direct you not to answer.

A I decline to answer on advice of counsel.

MR. SCALL: I offer this as the next Commission Exhibit.

MR. PERRIN: As I indicated, I have no objection to any of these things being marked for identification.

(A one-page document, a photocopy, front and back, of a check from the account of National Caucus of Labor Committees was marked as FEC Exhibit 6, for identification, as of this date.)

Q Mr. Welsh, did you handle any fund raisers for either the Committee to Elect Lyndon LaRouche or the U.S. Labor Party?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Mr. Welsh, did you do any fund raising yourself

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for the Committee to Elect Lyndon LaRouche or the U.S.
Labor Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who did fund raising for these two
groups, for either of them?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Mr. Welsh, did you have any dealings with the
lease or agreement to sublease of office space by the
Committee to Elect Lyndon LaRouche and/or the U.S. Labor
Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Do you know who handled leasing arrangements for
the Committee to Elect Lyndon LaRouche or the U.S. Labor
Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

MS. VAN GELDER: I have no questions.

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2 Would you like to cross-examine, Mr.
3 Perrin?

4 MR. PERRIN: No, thank you.

5 MS. VAN GELDEN: Mr. Welsh, thank you for
6 your time.

7 (Whereupon, at 11:25 o'clock a.m., the
8 deposition was concluded.)
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13 Subscribed and sworn to
14 before me this day
15 of , 1978.
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I N D E X

<u>Witness:</u>	<u>Page</u>
RICHARD WELSH	3

EXHIBITS

<u>FEC for iden.</u>	<u>Description</u>	<u>Page</u>
1	Report stamped "Received by the Federal Election Commission, February 24, 1977"	7
2	Two-page document appearing to be a report to the Federal Election Commission from the U.S. Labor Party	8
3	Group of three documents purporting to be reports of the U.S. Labor Party filed with the Federal Election Commission	9
4	Two-page document entitled "National Broadcasting Company, Inc., TV Network, Political Broadcast Order and Contract"	10
5	One-page document headed "National Broadcasting Company Adjustment Billing"	10
6	One-page document, a photocopy, front and back, of a check from the account of National Caucus of Labor Committees	16

* * *

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2 STATE OF NEW YORK)
3) SS:
4 COUNTY OF NEW YORK)

5 I, JEAN BRDEY, a Shorthand (Stenotype)
6 Reporter and Notary Public of the State of
7 New York, do hereby certify that the foregoing
8 Deposition of the witness, RICHARD WELSH,
9 taken at the time and place aforesaid, is a
10 true and correct transcription of my shorthand
11 notes.

12 I further certify that I am neither counsel
13 for nor related to any party to said action, nor
14 in any wise interested in the result or outcome
15 thereof.

16 IN WITNESS WHEREOF, I have hereunto set my
17 name this 17th day of February, 1978.
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7331

[illegible]

140 NASSAU STREET, NEW YORK, N.Y. 10038. RECTOR 2-5566

BEFORE THE FEDERAL ELECTION COMMISSION

-----X

In the Matter of :

The Committee to Elect LYNDON : MUR 398(77)
LaROUCHE

:
-----X

DEPOSITION of LAWRENCE HECHT, held at
231 West 29th Street, New York, New York, on
Thursday, the 16th day of February, 1978, commencing
at 10:25 o'clock a.m., before Jean Brdey, a
Shorthand (Stenotype) Reporter and Notary Public
within and for the State of New York.

* * *

RALPH FINK & ASSOCIATES, INC.

Certified Stenotype Reporters

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140 NASSAU STREET

NEW YORK, N.Y. 10038

REctor 2-5566

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A P P E A R A N C E S:

FEDERAL ELECTION COMMISSION
1325 K Street Northwest
Washington, D.C.

BY: BIZ VAN GELDER, Esq., of Counsel
LESTER N. SCALL, Esq., of Counsel

GREGORY J. PERRIN, Esq.
Attorney for Respondent
225 Broadway
New York, New York

P R E S E N T:

RENEE TOPOLDOS

* * *

P R O C E E D I N G S

MS. VAN GELDER: This is a deposition in the matter of the investigation of the Committee to Elect Lyndon LaRouche, et al.

We are at 231 West 29th Street, New York, New York. It is approximately 10:25.

Appearing for the individuals who shall be deposed today is Gregory J. Perrin, Esq.

MR. PERRIN: 225 Broadway, New York, New York.

MS. VAN GELDER: Appearing for the Federal Election Commission, 1325 K Street Northwest, Washington, D.C., Lester N. Scall, Esq., and Biz Van Gelder, Esq.

Mr. Perrin has consented to allowing the Federal Election Commission to depose each of the individuals alone.

Also present in the room will be, aside from the Court Reporter, will be --

MR. PERRIN: Miss Renee Topoldos, who is here as my assistant for the purpose of note taking to assist me in making handwritten notes, and also it is my intention to make a tape recording of these proceedings which is not to

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2 be the official transcript. It is merely to
3 assist me in reviewing what is said today as
4 quickly as is possible.

5 It will not be recording during any off-the-
6 record discussions between counsel.

7 MS. VAN GELDER: Off the record for a
8 second.

9 (Discussion off the record.)

10 MR. PERRIN: Let the record indicate that
11 there is no tape recorder being used during the
12 course of this examination. It just doesn't seem
13 to work.

14 L A W R E N C E H E C H T, called as a witness, having
15 been first duly sworn by Ms. Van Gelder, was examined
16 and testified as follows:

17 BY MS. VAN GELDER:

18 Q State your name for the record, please.

19 A My name is Lawrence Hecht.

20 Q Spell your last name, please.

21 A Spell it? H-e-c-h-t.

22 Q Your address, sir?

23 A 251 West 87th Street, New York City.

24 MR. PERRIN: Ms. Van Gelder, before we
25 commence the examination, I would like a

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2 representation from you as an attorney for the
3 Federal Election Commission that this examination
4 and questions to be posed to my client are not
5 based upon any electronic surveillance that has
6 been conducted of Mr. Hecht or any other person
7 wherein he became involved in the electronic
8 surveillance as a result of a conversation or
9 his presence at a particular place at a particular
10 time; of any kind whatsoever.

11 MS. VAN GELDER: The only answer I can
12 give you is that, to the best of my knowledge
13 and ability as the responsible attorney of this
14 record, that none of the information that I
15 will ask Mr. Hecht is based upon any electronic
16 surveillance; that, to my knowledge, there has
17 never been conducted by the Federal Election
18 Commission any electronic surveillance; and
19 all information we received from Mr. Hecht is
20 on the basis of our bookkeeper saying Mr. Hecht
21 was the bookkeeper for the USLP --

22 MR. PERRIN: That's not exactly my question.

23 My question is: Are the questions put to
24 this witness in any way based upon information
25 based upon electronic surveillance? Not

1
2 necessarily by your organization, but any
3 organization?

4 Are the questions based upon any electronic
5 surveillance at all?

6 MS. VAN GELDER: The only answer is, no,
7 but I'm questioning who is questioning whom.

8 MR. PERRIN: No. I just want to make a
9 record.

10 If you don't want to make your statement
11 for the record, just say so.

12 MS. VAN GELDER: Go ahead.

13 I will tell you when I think it gets too
14 ridiculous.

15 MR. PERRIN: Has there been an electronic
16 surveillance of my client or anyone else which
17 produced an overheard of my client, to your
18 knowledge?

19 MS. VAN GELDER: To my knowledge, no, and
20 also just to add, that the sole investigatory
21 record that is compiled within the Federal
22 Election Commission that is the basis of MUR 398
23 has been compiled solely by Agents of the
24 Federal Election Commission; be it auditors,
25 investigators or attorneys, and that the Federal

1 Election Commission has not received any infor-
2 mation, to the best of my knowledge, from any
3 other agency of the United States government.
4

5 The only information that we have ever
6 received from any other agency of the United
7 States government has been a consoling in the
8 defense of the case of Leroy B. Jones, et al,
9 versus unknown agents of the Federal Election
10 Commission, and the only reason why we cooperated
11 with them in that manner is that the plaintiffs
12 in that action did not specifically allege any
13 violations of the Federal Election Campaign
14 Act.

15 MR. PERRIN: Thank you.

16 BY MS. VAN GELDER:

17 Q Mr. Hecht, what is your occupation?

18 MR. PERRIN: I direct you, Mr. Hecht, not
19 to answer the question on the ground that it's
20 violative of your rights under the First and
21 Fifth Amendments of the United States Constitution.

22 Q Mr. Hecht, you have to say I refuse to answer
23 on the grounds --

24 MR. PERRIN: I refuse to answer on the
25 advice of counsel.

MS. VAN GELDER: On the grounds that --

A I refuse to answer on the advice of counsel.

Q Mr. Hecht, what is your business address?

MR. PERRIN: I direct you not to answer on the grounds the question is violative of your First and Fifth Amendment rights of the United States Constitution.

You say you refuse to answer on the advice of counsel.

A I refuse to answer on the advice of counsel.

MS. VAN GELDER: Off the record.

(Discussion off the record.)

BY MS. VAN GELDER:

Q Mr. Hecht, are you familiar with an organization by the name of the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds as previously stated.

You say, on advice of counsel.

A I decline to answer that on the advice of counsel.

Q Mr. Hecht, are you familiar with an organization by the name of the National Conference of Labor Committees?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer again on the advice of

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2 counsel.

3 Q Mr. Hecht, are you familiar with an organization
4 by the name of -- excuse me, a political party by the name
5 of the United States Labor Party?

6 MR. PERRIN: I direct you not to answer
7 on the same grounds.

8 A I decline to answer on the advice of counsel.

9 Q Mr. Hecht, are you familiar with a corporation
10 by the name of New Solidarity International Press Service?

11 MR. PERRIN: I direct you not to answer
12 on the same grounds.

13 A I decline to answer on the advice of counsel.

14 Q Mr. Hecht, are you familiar with a corporation
15 by the name of Campaigner Publications?

16 MR. PERRIN: I direct you not to answer
17 on the same grounds.

18 A I decline to answer that on the advice of counsel.

19 Q Were you ever the bookkeeper for the United
20 States Labor Party?

21 MR. PERRIN: I direct you not to answer on
22 the same grounds.

23 A I decline to answer on advice of counsel.

24 Q Were you ever the bookkeeper for the Committee
25 to Elect Lyndon LaRouche?

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MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on counsel's advice.

Q Mr. Hecht, have you ever had any supervisory
capacity in the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer that on counsel's advice.

Q Mr. Hecht, have you ever had any conversations
with Mr. Joseph Stoltz of the Federal Election Commission?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on the advice of counsel.

MS. VAN GELDER: Off the record.

(Discussion off the record.)

MS. VAN GELDER: Would you like to ask
any questions?

MR. SCALL: No questions.

MS. VAN GELDER: Would you like to cross-
examine?

MR. PERRIN: No.

MS. VAN GELDER: Thank you very much for
your time.

(Whereupon, at 10:50 o'clock a.m., the
deposition was concluded.)


Subscribed and sworn to
before me this day
of , 1978.

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2 STATE OF NEW YORK)
3) SS:
4 COUNTY OF NEW YORK)

5 I, JEAN BRDEY, a Shorthand (Stenotype)
6 Reporter and Notary Public of the State of
7 New York, do hereby certify that the foregoing
8 Deposition of the witness, LAWRENCE HECHT,
9 taken at the time and place aforesaid, is a
10 true and correct transcription of my shorthand
11 notes.

12 I further certify that I am neither counsel
13 for nor related to any party to said action, nor
14 in any wise interested in the result or outcome
15 thereof.

16 IN WITNESS WHEREOF, I have hereunto set my
17 name this 17th day of February, 1978.

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JB/je

BEFORE THE FEDERAL ELECTION COMMISSION

-----x

In the Matter of :

The Committee to Elect LYNDON : MUR 398(77)
LaROUCHE

-----x

DEPOSITION of MARCIA MERRY PEPPER, held at
231 West 29th Street, New York, New York, on
Thursday, the 16th day of February, 1978,
commencing at 11:35 o'clock a.m., before Jean
Brdey, a Shorthand (Stenotype) Reporter and
Notary Public within and for the State of New
York.

* * *

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NEW YORK, N.Y. 10038

REctor 2-5566

A P P E A R A N C E S :

FEDERAL ELECTION COMMISSION
1325 K Street Northwest
Washington, D.C.

BY: BIZ VAN GELDER, Esq., of Counsel
LESTER N. SCALL, Esq., of Counsel

GREGORY J. PERRIN, Esq.
Attorney for Respondent
225 Broadway
New York, New York

P R E S E N T :

RENEE TOPOLDOS

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M A R C I A M E R R Y P E P P E R, called as a
witness, having been first duly sworn by Ms.
Van Gelder, was examined and testified as follows:

BY MS. VAN GELDER:

Q What is your name, please?

A Marcia Merry Pepper.

Q Your address?

A 110 Bennett Avenue, New York, New York.

Q Your occupation?

MR. PERRIN: I direct you not to answer
on the grounds the question is violative of
your First and Fifth Amendment rights.

Please tell the stenographer that you
decline to answer on the advice of counsel and
that is what we will do through the whole thing.

A I decline to answer on advice of counsel.

MS. VAN GELDER: Off the record a second.

(Discussion off the record.)

MS. VAN GELDER: Back on the record.

BY MS. VAN GELDER:

Q Were you ever known as Marcia Merry?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

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Q Ms. Pepper, were you ever the Chairperson of the Presidential Campaign Committee of Lyndon LaRouche known as the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, would you care to expand on what your duties as the Chairperson of the Committee to Elect Lyndon LaRouche are?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you be the person, as Chairperson of the Committee to Elect Lyndon LaRouche, who would coordinate campaign activities with Mr. LaRouche with various State and Local organizations, State and Local Committees to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you be the person, as Chairperson of the Committee to Elect Lyndon LaRouche, who would be in charge of the fund raising activities of the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you be the person, as
Chairperson of the Committee to Elect Lyndon LaRouche, who
would be in charge of the contributions' solicitations to
the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, are you familiar with an organization
or a political party by the name of the United States Labor
Party?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q To the best of your knowledge, is the U.S.
Labor Party the party of the candidate, Lyndon LaRouche?

MR. PERRIN: I direct you not to answer.

A I decline to answer on the advice of counsel.

Q As Chairperson of the Committee to Elect
Lyndon LaRouche, would you have coordination facilities
or coordination activities with the United States Labor
Party?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, are you familiar with an organization which is called the National Caucus of Labor Committees?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Would you, in your capacity as the Chairperson for the Committee to Elect Lyndon LaRouche, enter into agreements or coordinate activities with the National Caucus of Labor Committees concerning the Presidential Campaign of Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Would you, as Chairperson of the Committee to Elect Lyndon LaRouche, enter into agreements for rents and facilities for the Committee to Elect Lyndon LaRouche with the National Caucus of Labor Committees?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Could you direct the Commission as to who would

under your supervision, or who would within the Committee's structure be the person who would enter into a lease agreement with the National Caucus of Labor Committees concerning State and Local, plus National office space?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Does the Committee to Elect Lyndon LaRouche have a local office in Baltimore, Maryland?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q As Chairperson of the Committee to Elect Lyndon LaRouche, to the best of your knowledge, do you know if the Committee has a local headquarters in Boston, Massachusetts?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

Q To the best of your knowledge, as Chairperson of the Committee to Elect Lyndon LaRouche, does the Committee to Elect Lyndon LaRouche have a local office in Buffalo, New York?

MR. PERRIN: I direct you not to answer on the same grounds.

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A I decline to answer on advice of counsel.

Q To the best of your knowledge, as Chairperson of the Committee to Elect Lyndon LaRouche, does the Committee to Elect Lyndon LaRouche -- heretofore referred to as CTCL -- does CTCL have a local office in Charlotte, North Carolina?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q To the best of your knowledge, as Chairperson of the CTCL, does CTCL have a local office in Chicago, Illinois?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q To the best of your knowledge, as Chairperson of CTCL, does CTCL have a local office in Detroit, Michigan?

MR. PERRIN: I direct you not to answer on the same grounds.

Let the record indicate that my client has not answered any questions here today beyond her name and address.

Your question assumes she has a position which she has not acknowledged that she has.

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2 She has not answered any questions.

3 MS. VAN GELDER: Just three or four more
4 questions and I will give you a document you
5 can look at.

6 Q Does CTCL, as Chairperson of CTCL, does CTCL,
7 to the best of your knowledge, have local offices in the
8 cities of Denver, Colorado; Newark, New Jersey; Philadelphia,
9 Pennsylvania; San Francisco, California; Seattle, Washington;
10 Washington, D.C.; Hartford, Connecticut and New York City,
11 New York?

12 MR. PERRIN: I direct you not to answer
13 on the same grounds.

14 A I decline to answer on advice of counsel.

15 Q Ms. Pepper, I will show you for identification
16 an agreement that was entered into between the Committee
17 to Elect Lyndon LaRouche and the National Caucus of Labor
18 Committees, an unsigned agreement in which CTCL agrees to
19 pay \$8,990 a month to NCLC for certain facilities to include
20 office space, utilities and phones.

21 And on Page 3 of the -- Page 2, but it is
22 actually on Page 3 of the signed agreement, could you please
23 look at the top signature which appears to be the signature
24 of Marcia Merry Pepper, Chairperson -- Chairman?

25 MR. PERRIN: I direct you not to answer

on the same grounds.

MS. VAN GELDER: Undated.

I would like to make a correction. I said unsigned. It is undated.

MR. PERRIN: Okay. Fine.

A I decline to answer on the advice of counsel.

MS. VAN GELDER: I would like to have this attached to Ms. Pepper's deposition as Commission attachment No. 1.

(A three-page document, top sheet entitled "Agreement" was marked as FEC Attachment 1, as of this date.)

BY MS. VAN GELDER:

Q Ms. Pepper, do you have any knowledge as Chairperson of the Committee to Elect Lyndon LaRouche of the purpose of \$38,200 of expenditures to the National Caucus of Labor Committees' legal staff?

Billing of it, not expenditure --

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Would you know who could answer that question?

MR. PERRIN: I direct you not to answer on the same grounds.

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A I decline to answer on advice of counsel.

Q Ms. Pepper, to the best of your knowledge, was CTEL's address 231 West 29th Street, New York, New York, main address?

MR. PERRIN: I direct you not to answer.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you, as Chairperson of the Committee to Elect Lyndon LaRouche, be the person who would direct expenditures for various legislation and research for Mr. LaRouche's presidential campaign?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Could you direct the Commission to who would be the person who is the coordinator for legislation and research for the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, are you familiar with a corporation by the name of the New Solidarity International Press Service?

MR. PERRIN: I direct you not to answer on the same grounds.

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A I decline to answer on advice of counsel.

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Q Ms. Pepper, would you be the person who would direct Campaigner Publications to do advertising for the Committee to Elect Lyndon LaRouche?

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MR. PERRIN: I direct you not to answer on the same grounds.

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A I decline to answer on advice of counsel.

Q Could you direct the Commission to who would be the person who would direct Campaigner Publications to do advertising for the Committee to Elect Lyndon LaRouche?

MR. PERRIN: I direct you not to answer

on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you have any knowledge of payments beginning on August 11, 1976 from CTCL to NCLC, Local and State Chapter?

MR. PERRIN: I direct you not to answer

on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, could you direct the Commission to who could answer that -- excuse me.

Could you direct the Commission to the person who could answer who made or directed payments to NCLC State and Local Chapters from CTCL?

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MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, are you
familiar with the nature and purpose of any in-kind contri-
butions from National Caucus of Labor Committees?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, would you
please explain the nature and the purpose of payments to
the USLP lenders who loaned money to USLP -- repayments by
CTCL to USLP lenders for payments to help the NBC broadcast?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, are you familiar with any fund
raisers held in Philadelphia, New York, Baltimore, Boston,
Detroit, Chicago and Cincinnati between the dates of
November 21, 1976 and November 31, 1976?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, would you

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2 be the person who organized any fund raisers in these
3 cities?

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MR. PERRIN: I direct you not to answer
5 on the same grounds.

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A I decline to answer on advice of counsel.

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Q Ms. Pepper, could you direct the Commission
8 to who did organize these fund raisers?

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MR. PERRIN: I direct you not to answer
10 on the same grounds.

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A I decline to answer on advice of counsel.

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Q Ms. Pepper, do you have any knowledge of the
13 manner in which the money was received in any fund raisers
14 between these states?

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MR. PERRIN: I direct you not to answer
16 on the same grounds.

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A I decline to answer on advice of counsel.

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Q Ms. Pepper, as Chairperson of CTCL, do you have
19 any knowledge of the disposition of that money that was
20 received at these alleged fund raisers?

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MR. PERRIN: I direct you not to answer
22 on the same grounds.

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A I decline to answer on advice of counsel.

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Q Ms. Pepper, as Chairperson of CTCL, do you have
25 any knowledge of actual floor space that CTCL occupied during

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the time period of January 1, 1976 till December 31, 1976?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

MR. PERRIN: And the form of the question
should not be construed as acceptance by
myself as to any position held by my client.

It's your question. I'm not answering it.

Q Ms. Pepper, as Chairperson of CTCL, do you have
any knowledge of the standing operating expenses of the
State and Local CTCLs?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, do you have
any knowledge of any arrangement to share personnel or
equipment with NCLC?

MR. PERRIN: I direct you not to answer on
the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, do you have
any knowledge of any arrangement to share personnel and/or
equipment with the United States Labor Party's local organiza-
tions?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, as Chairperson of CTCL, would you
be involved in policy decisions as to the direction of
LaRouche's presidential campaign?

MR. PERRIN: I direct you not to answer
on the same grounds.

A I decline to answer on advice of counsel.

MR. PERRIN: I point out, once again, that
it is your question and I'm not acknowledging
that my client has any position whatsoever.

Q Ms. Pepper, would you have any direction in
the submission of the -- of matching funds by the Committee
to Elect Lyndon LaRouche with the Federal Election Commis-
sion?

MR. PERRIN: I direct you not to answer.

A I decline to answer on advice of counsel.

Q Ms. Pepper, would you have any coordination
authority to direct the solicitation and acceptance of
contributions in the twenty states which were used for matching
funds?

MR. PERRIN: I direct you not to answer
on the same grounds.

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A I decline to answer on advice of counsel.

Q Ms. Pepper, could you please direct the Commission as to who planned and executed the solicitation and receipt of contributions to the Committee to Elect Lyndon LaRouche for the purpose of obtaining matching funds from the Federal government?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, are you affiliated, in any way, with the National Caucus of Labor Committees?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, are you affiliated, in any way, with the United States Labor Party?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, are you an incorporator or a stockholder in the New Solidarity International Press Service Corporation?

MR. PERRIN: I direct you not to answer on the same grounds.

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A I decline to answer on advice of counsel.

Q Ms. Pepper, are you a director, incorporator or stockholder in the incorporation -- of the corporation of Campaigner Publications?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you have any knowledge, particularly as Chairperson of CTCL, of why Campaigner Publications paid for Lyndon LaRouche's trip to Europe during the Summer of 1976?

MR. PERRIN: I object to the question on the same grounds.

MS. VAN GELDER: It appears that -- go ahead.

A I decline to answer on advice of counsel.

Q Did CTCL reimburse Campaigner Publications for any part of this trip?

MR. PERRIN: I object to the question on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, how many State and Local organizations of CTCL are there?

MR. PERRIN: Object to the question on the

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same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, were you authorized to write checks for CTCL?

MR. PERRIN: Object to the question on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, are you familiar with a periodical entitled New Solidarity?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Do you have any knowledge of the distribution and sale of New Solidarity?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, did you work out any arrangements through CTCL with New Solidarity International Press Service and/or Campaigner Publications to extend credit during the litigation of the matching funds submission?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

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Q Ms. Pepper, I only have a few more questions.

Do you have any knowledge of the transfers to the United States Labor Party to repay -- by CTCL to repay loans to the following people: Jeanne Laudon, Barbara Frazier, Ed DeBuist, Ron Kastner and Tim Rush?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, could you direct the Commission to who could inform us of the nature and purpose of this transfer?

MR. PERRIN: Object on the same grounds.

A I decline to answer on the advice of counsel.

Q Ms. Pepper, do you have any information which could explain why the National Caucus of Labor Committees transferred from Local NCLCs in early October of 1976 -- strike that.

Could you explain why the Committee to Elect Lyndon LaRouche expended on account to Local NCLCs during early October of 1976 roughly \$24,000?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, could you please -- off the record.

(Discussion off the record.)

BY MS. VAN GELDER:

Q Are you familiar with the Federal Election Campaign Act and its requirements?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

Q Ms. Pepper, did you ever direct, assist or participate in the preparation of reports by the Committee to Elect Lyndon LaRouche that were submitted to the Federal Election Commission?

MR. PERRIN: I direct you not to answer on the same grounds.

A I decline to answer on advice of counsel.

MS. VAN GELDER: I have no more questions. Mr. Scall?

MR. SCALL: No questions.

MS. VAN GELDER: I have no questions. Do you want to cross-examine?

MR. PERRIN: No.

MS. VAN GELDER: Ms. Pepper, I appreciate your cooperation and time.

(Whereupon, at 12:10 o'clock p.m., the
deposition was concluded.)

Subscribed and sworn to
before me this day
of , 1978.

I N D E X

<u>Witness:</u>	<u>Page</u>
MARCIA MERRY PEPPER	3

EXHIBITS

<u>FEC Attachment</u>	<u>Description</u>	<u>Page</u>
1	Three-page document, top sheet entitled "Agreement"	10

* * *

February 16, 1978
New York, New York

1
2 STATE OF NEW YORK)
3) SS:
4 COUNTY OF NEW YORK)

5 I, JEAN BRDEY, a Shorthand (Stenotype)
6 Reporter and Notary Public of the State of New
7 York, do hereby certify that the foregoing
8 Deposition of the witness, MARCIA MERRY PEPPER,
9 taken at the time and place aforesaid, is a true
10 and correct transcription of my shorthand notes.

11 I further certify that I am neither counsel
12 for nor related to any party to said action, nor
13 in any wise interested in the result or outcome
14 thereof.

15 IN WITNESS WHEREOF, I have hereunto set my
16 name this 17th day of February, 1978.

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19 JEAN BRDEY
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000709

[illegible]

140 NASSAU STREET, NEW YORK, N.Y. 10038. RECTOR 2-5566

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named as a subject of the investigation herein -- are as follows: The National Caucus of Labor Committees (hereafter, NCLC); the United States Labor Party (hereafter, USLP); the Committee to Elect Lyndon LaRouche (hereafter, CTEL); New Solidarity International Press Service (hereafter, New Solidarity); and Campaigner Publications.

The NCLC, a non reporting entity, appears to be the umbrella organization for the other four groups. It was founded in 1967 by Mr. LaRouche, who is currently its Chairman. Shortly after, Mr. LaRouche formed the electoral arm of the organization, USLP. This group, registered with the Commission as a political committee in October, 1975, and has been filing campaign reports since that time. Accordingly to a letter received from its counsel in October, 1976, USLP has set up a large number of state groups, some of which have also filed reports with the Commission. The USLP unanimously nominated Mr. LaRouche as its presidential candidate on October 16, 1976, after Mr. LaRouche received the support of the U. S. Labor Party Caucus in each of 30 states.

CTEL, also a reporting entity, is the principal campaign committee of the LaRouche Presidential Campaign.

NCLC members incorporated New Solidarity International Press Service and Campaigner Publications in New York in 1974. The former corporation is apparently the "intelligence" arm

of NCLC since USLP and CTCL reports list expenditures to it for "research and legislation." The latter corporation publishes The Campaigner magazine, a monthly publication, and New Solidarity, a biweekly paper which is published in six languages. Both publications present themselves in their publications as the "voices" of NCLC and USLP.

A chart outlining the relationship of NCLC, CTCL, USLP, New Solidarity, and Campaigner Publications is appended hereto as Exhibit 1 A. Also appended as Exhibit 1 B is a chart setting forth personnel relationships between NCLC, USLP, CTCL, New Solidarity, and Campaigner Publications.

B. Prior Proceedings

(1) MURs

Exclusive of the apparent violations noted in Part IV, Section A of this report, there have been three MURs involving the LaRouche Presidential Campaign in which the Commission has found reason to believe that violations of the federal election statutes were committed.

In MUR 281 (77) the Commission found reason to believe the CTCL had violated 2 U.S.C. §434(b) because of its failure to disclose in its reports the names and addresses and the occupation and principal place of business of contributors. Subsequently, a list of names and addresses was furnished, as part of the request for presidential primary matching funds by Mr. LaRouche. However, a staff review of the request raised a number of factual issues as

to the veracity of the information set forth therein. Accordingly, in a separate MUR (#368), the Commission found reason to believe the CTEL had violated 2 U.S.C. §441(f) and 26 U.S.C. §9042(d). Finally, in MUR 328 the Commission found reason to believe that CTEL had committed an additional violation of §434 because of its failure to indicate the source of a \$90,000 expenditure for an election eve broadcast by Mr. LaRouche. Although the expenditure was subsequently reported by the U.S. Labor Party, the accuracy of the reports is still questionable (see, infra).

(2) Request for Presidential Primary Matching Funds.

On October 14, 1976, Mr. LaRouche submitted a request to the Commission seeking presidential primary matching funds.

On November 4, 1976, the Commission approved, pursuant to the provisions of 2 U.S.C. §438(a)(8), a matching fund threshold audit of CTEL.

The audit reviewed expenditure and contribution records of CTEL for the period September 1, 1975 to October 18, 1976. As indicated in a memorandum to the Commission, dated December 27, 1976, the staff found that the bulk of the contributions to CTEL (57%) was received in the last two weeks of eligibility, with NCLC volunteer contributions accounting for a significant portion of the monies received (16%). In many cases, the contributor's listed occupation

seemed unusual for the amount donated. Many contributions were in cash. (The Memorandum to the Commission is appended as Exhibit 2). As for expenditures and debts of CTEL, many of these could not be verified from the records supplied.

On January 14, 1977 the Commission approved the direct contacting of contributors to verify contributions in three states: Delaware, Massachusetts, and Wisconsin. The contacts indicated that a substantial number of contributions could not be verified, either because the contributor could not be located at the address listed, refused to be interviewed, or denied making all or part of the donation. Moreover, in one instance a contributor indicated that the contribution had not been made out of his own funds (a report summarizing the findings of the contributor contacts was sent to the Commission on February 10, 1977; it is appended hereto as Exhibit 3).

A request to examine the records of NCLC, USLP, New Solidarity and Campaigner Publications as part of the examination of CTEL's submission for matching funds on the ground that they were affiliated organizations was rejected by CTEL by letter dated January 26, 1977 on the ground that the organizations were independent.

On February 10, 1977 the Commission unanimously determined that Mr. LaRouche had not satisfied the provisions of 26 U.S.C. §§9033(b)(3) and (4) and should therefore be denied matching funds.

Thereafter CTCL, USLP, Lyndon LaRouche, and LeRoy Jones (an official of the USLP) filed suit in the U. S. Court of Appeals for the District of Columbia (CA No. 77-1184) disputing the Commission's determination that CTCL is ineligible for matching funds. That suit is presently pending. Also pending is a class action filed by the USLP and other related plaintiffs alleging, in essence, that the Commission's staff in attempting to verify contributions in Delaware, Massachusetts, and Wisconsin violated the rights of the persons contacted.

III. Apparent Violations Committed by Respondents.

A. Overview.

The apparent infractions committed by respondents fall into two general categories.

The first and most substantial category consists of matters which follow or can be inferred from the financial information and other data actually reported by USLP and CTCL. These include possible illegal in-kind contributions to LaRouche by New Solidarity and Campaigner Publications; possible affiliation of USLP, NCLC, and CTCL; failure of NCLC to register and report as a political committee.

The second group of violations involves the possibility that CTCL and USLP have knowingly reported or facilitated the reporting of false information. These include possible violations of 2 U.S.C. §441(f) and 26 U.S.C. §§9042(c) and (d) by both groups.

We herewith set forth a description of the particular violations committed by each of the named respondents. These violations as already noted, are in addition to those already set forth in MURs 281, 328, and 368. A description of our proposals for further investigation of this matter is set forth in Section IV, Part B.

B. Particular Violations Apparently Committed by Respondents.

1. NCLC:

2 U.S.C. 431(d) defines a "political committee" to mean any committee, club, association, or other group of persons which receive contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal Election.

The various reports of CTEL list a total of \$6,250 in in-kind contributions from NCLC, with no further explanation as to what the in-kind contributions were for. In addition, NCLC volunteers supplied 16% of the total contributions listed in the LaRouche Presidential Primary matching fund submission. Finally, NCLC rents office space to CTEL for which there is an outstanding debt of \$35,030.27, as of to date. This debt has been accumulating for six months and, if not subject to repayment procedures in the ordinary course of business, may be a contribution in-kind. It would therefore appear that NCLC is a "political committee" within the meaning of §431(d) and is subject to the registration and reporting requirements of 2 U.S.C. §§433, and 434. In fact, NCLC has filed no report with the Commission.

It also seems clear that NCLC does not fulfill the statutory definition of "multicandidate committee" since it has not registered at the Commission as such for 6 months. (See 2 U.S.C. §441a(a)(4)). Therefore NCLC is precluded from making any contributions to a candidate's political committee (in this case CTCL) in excess of \$1,000. As already noted, it appears that NCLC's contributions to the LaRouche Campaign have exceeded this amount.

Although we do not have a copy of the rental agreement between USLP and NCLC, the USLP lists a monthly rental obligation to NCLC of \$8,990 a month. In its year end report, the USLP lists this obligation as an outstanding debt since February, 1976. In fact, USLP has tendered only \$7,150, (less than one month's rent) to NCLC in satisfaction of a \$98,890 amount owed. This leaves an obligation of \$91, 640 outstanding as the close of calendar year 1976. The steady accumulation of the USLP debt to NCLC and its nonpayment suggests that it, like the CTCL debt to NCLC, may be a contribution in-kind and, as such, a violation of the limitations in 2 U.S.C. §441a(1)(A).

2. USLP:

The United States Labor Party, NCLC, and CTCL all share the same office space at 231 W. 29th Street, N.Y., N.Y. 1001. All three groups appear to have many common officers and substantial personnel overlaps. These overlaps are

described in Exhibit 1B. Among the most significant are Lyndon LaRouche, who is candidate and chairman of USLP, chairman of NCLC, and the presidential candidate of CTCL; Richard Welsh, who is treasurer of both USLP and CTCL; and Stephen Pepper, who is financial consultant to CTCL, a member of the convention committee of USLP, and controller of Campaigner Publications.

It should also be noted in this connection that respondents themselves have referred to USLP and NCLC as interchangeable entities. In a memorandum to law submitted to the U.S. District Court for the Eastern District of Michigan, it is stated:

"Each plaintiff (e.g., in the law suit) is a member of a socialist political organization referred to herein as the United States Labor Party ("USLP") and also known as the National Caucus of Labor Committees ("NCLC").

At the time of the November 1976 audit of CTCL to determine whether the group was entitled to Presidential Primary Matching Funds, CTCL had made 40% of its total expenditures to USLP and NCLC. In addition a substantial portion of the remainder of CTCL's expenditures were to New Solidarity and Campaigner, two other groups, which, as indicated earlier, may be intertwined with the NCLC and the United States Labor Party. Finally, as already noted, a substantial number of contributions to CTCL were made by

persons who are described as volunteers for NCLC. CTCL also reports repaying individuals who made loans to USLP.

The evidence heretofore adduced indicates there is reason to believe NCLC, USLP, and CTCL are affiliated political committees. As such they have failed to report the affiliation as required by 2 U.S.C. §433(b) (2).

It should be noted in this connection that on the basis of letters and submissions received from USLP and CTCL, it is not unlikely that the USLP will assert that it is the national committee of a political party and is therefore entitled to the exemption of 2 U.S.C. §441a(d), covering contributions and expenditures by the "national committee of a political party." Whether NCLC could possibly make the same claim is unclear.

3. New Solidarity:

Our review of publications by New Solidarity indicates that its primary purpose in 1976 was to do research and prepare position papers for the U.S. Labor Party and CTCL. A review of the reports of USLP for 1976 discloses that New Solidarity billed USLP for \$9,600 of services during 1976, and collected only \$976, leaving an outstanding debt at the end of the calendar year of \$8,624.

Similarly, New Solidarity billed CTCL for services valued at \$25,050, and received payment for \$4,309, thus leaving a balance of \$20,741 uncollected. As in the case of the CTCL and USLP debts to NCLC, there is a possibility that the debts

owed to New Solidarity are in fact contributions. If this is true, New Solidarity would have violated 2 U.S.C. §441b(a) since it is a corporation. A §441a violation would be involved if the group is incorporated.

4. Campaigner Publications:

Campaigner Publications appears to be responsible for advertising, video tape production and printing. Its two publications, as already noted, are The Campaigner and New Solidarity. Both publications have as sole clients CTCL and USLP.

The year end reports of the USLP from August 1, 1976, through December 31, 1976, indicate that the USLP purchased services from Campaigner Publications worth 59,032.62. During that same period, the USLP made payments amounting only to 7,979.22 thus leaving an outstanding debt for the last half of 1976 of \$51,062.40. Campaigner's billings to CTCL during the same period were listed as \$50,318.92, while Campaigner received only \$15,584.05 in satisfaction. Therefore \$35,050 remains as a debt.

Again, the heavy accumulation of debt over a substantial period of time and the apparent lack of an attempt to discharge it, indicates reason to believe the debts may in fact be contributions, and, if that, would violate §441b (Campaigner Publications is incorporated). A §441a violation may be involved if the group is unincorporated.

5. CTCL;

In MUR 368 the Commission adopted a staff

recommendation indicating, inter alia, that there was reason to believe CTEL had violated 2 U.S.C. §441 f and 28 U.S.C. §9042(d)(i) by accepting contributions made in the name of another. It would also appear, based on our continued analysis of the information involved in that MUR, that there is reason to believe CTEL has violated 28 U.S.C. §9042 (c)(1) by furnishing false information to the Commission during its audit in connection with the group's request to the commission for presidential primary matching funds.

IV. Recommendations

A. Findings of Reason to Believe (MUR 398)

The Office of General Counsel recommends that the Commission find reason to believe that the following violations have been committed:

- (1) National Caucus of Labor Committees (NCLC) has violated:
 - (a) 2 U.S.C. §434 by failing to register and report with the Commission.
 - (b) 2 U.S.C. §441a by making excessive contributions in-kind to CTEL and USLP.
 - (c) 2 U.S.C. §433(b)(2) by not registering as an affiliated committee with USLP and CTEL.
- (2) New Solidarity International Press Service has violated:
 - (a) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTEL and NCLC on behalf of the LaRouche presidential campaign.

- (3) Campaigner Publications has violated:
 - (a) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTEL and NCLC on behalf of the LaRouche presidential campaign.
- (4) Committee to Elect Lyndon LaRouche has violated:
 - (a) 26 U.S.C. §9042 by making false and misleading statements in reports for certifications and on audit reports.
 - (b) 2 U.S.C. §433 (b)(2) by failing to report affiliation with USLP and NCLC.
- (5) U.S. Labor Party has violated:
 - (a) 2 U.S.C. §433 (b)(2) by not reporting its affiliation with CTEL and NCLC.

B. Further Investigation

Our analysis of the activities of CTEL, USLP, NCLC, New Solidarity and Campaigner Publications suggests the need for further investigation of these groups to resolve the factual issues arising from the apparent coordination of their activities with the LaRouche Presidential Campaign. The investigation would focus on records of all expenditures made or services furnished by the groups in question to the LaRouche campaign. This would include, but not necessarily be limited, to billings, contractual arrangements (such as rental agreements), records of payments received from CTEL, records of deposits of said payments, concrete proof of services provided to CTEL. The investigation would probably require the presence of at least two auditors.

9039
invest.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Citizens for LaRouche et al.

MURs 1158, 1186,
1202, 1253
A-774

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 7, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding the above-captioned matters:

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.
2. 100% review by the Audit Division of the following five threshold states:

part of
[Maryland
Virginia
Ohio
Oregon
Missouri]

See Audit Report
2/81 - becomes incorp in MURs 1158, 1186, 1202 + 1254

3. Authorize the taking of the following depositions:

chi Paul Greenberg ✓ *no depo*
chi Theresa Seiler ✓
chi Robert Hart ✓
chi Janice Hart ✓
Buff Joyce Rubinstein
chi William Lerth ✓
chi Melvin Klenetsky

Ronald Bettog ✓ *St. Louis*
John Brown ✓
Mitchell Hirsch ✓
Gerald Pechenak ✓ *St. Louis*
Kirby Ashley *chi*
Sander Perety Friedman ✓
Matthew Gruice *Buff*

(Continued)

CERTIFICATION

Page 2

MURs 1158, 1186,

1202, 1253; A-774

Memorandum to the Commission

Dated: August 5, 1980

3. (Continued)

Robert Pierce ✓

Victoria Lacy ✓

Ch Elliot Eisenberg

Ch Shaw/Waffle

Ch Roger Ham *Buff*

Denise Ham *Buff*

Linda Fisch "

Jennifer Roe "

Khaxbro Gandhi "

Voting for this determination were Commissioners

Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8/7/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 8-5-80, 10:00
Circulated on 48 hour vote basis: 8-5-80, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

80 AUG 5 AIO: 00

August 5, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Report on Various Matters Concerning
Citizens for LaRouche (including request
for authorization to issue subpoenas for
deposition); RE: A-774 and MURs 1158,
1186, 1202 and 1253.

In a memorandum dated April 23, 1980, the Office of General Counsel presented a status report of the various investigations concerning Citizens for LaRouche (CFL), the principal campaign committee of Lyndon H. LaRouche, Jr. As is more fully discussed below, an expanded review of CFL is now warranted.

New Developments

In MUR 1158 the Commission found reason to believe that an individual representing CFL may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A) by falsifying contributor information and documentation submitted to the Commission for matching and by contributing money in the name of another. In its investigation, this Office has evidence which indicates that representatives of CFL did indeed falsify contributor information and documentation by submitting written instruments for matching fund payments attributable to individuals who assert that they have not made contributions to Lyndon LaRouche or who have made contributions in cash.

In another matter referred to this office by the Audit Division (audit referral of June 16, 1980), there exists a factual pattern involving money orders that bears a striking resemblance to this situation which appears to exist in MUR 1158.

In its review of CFL's books and records pursuant to 26 U.S.C. § 9038, the audit division uncovered matters which it referred to the Office of General Counsel. 1/ Finding C of the Audit Report

1/ Findings A and B of the Audit relating to receipt of excessive contributions and unqualified campaign expenses will be addressed in a General Counsel's Report.

Memorandum to the Commission

Page 2

Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

(attached) presents a factual pattern strikingly similar to the one addressed by the Commission in MUR 1158, in that a review of money orders and cashier's checks contributed to CFL disclosed several irregularities. A discussion of the irregularities is supplemented by Exhibits C, D, E, F, G, H, and I, (attached) which provide further detail on these receipts.

The initial pattern noted during the review of photocopies of contribution instruments was the large number of money orders issued from two (2) Chicago banking entities which were deposited in the New York headquarters account between December 10th and 17th. An examination of the serial numbers and dates of purchase associated with these money orders revealed that many instruments were consecutively numbered and purchased on or about the same date (See Exhibit C). Additional money orders with serial number patterns or linkage to the December deposits were also noted. A total of 31 money orders received from 23 contributors were examined during this review. The auditors ascertained that 21 of the 23 contributors of money orders were listed as "unemployed."

1. Money Orders Purchased From Illinois Banking Institutions

The most significant facts in the pertinent part of the Audit referral pertaining to Chicago are:

- a) the similarity of handwriting on the payee lines of most of the instruments; and,
- b) signature irregularities in the instruments submitted by CFL which bear the purported signatures of:
 - i. Janice Hart (Exhibit D, Nos. 1 and 7; and Exhibit E);
 - ii. Robert Hart (Exhibit D, No. 21; compare to Exhibit D, No. 1);
 - iii. William Lerch (Exhibit D, Nos. 2 and 15);
 - iv. Melvin Klenetsky (Exhibit D, Nos. 3 and 13);
 - v. Victoria Lacy (Exhibit H; and Exhibit D, Nos. 5 and 9);
 - vi. Paul Greenberg (Exhibit D, No. 6; and Exhibit I, both compared to Exhibit D, No. 21); and,

Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

- vii. Elliot R. Eisenberg (Exhibit D, Nos. 6 and 8;
compared to exhibits of Paul Greenberg,
supra). 2/

Recognizing that handwriting differences can be determined authoritatively only by experts within the field of handwriting analysis, it still appears that the purported signatures of the above-mentioned individuals are so different that there is reason to doubt that they were signed by the same person.

A review was also conducted by the Audit Division to determine if any of the questionable money orders were matched. The results of the review indicated that 23 instruments were submitted by the Committee for matching. 3/

2. Money Orders Purchased From New York Banking Institutions

- a) Chase Manhattan Bank - The handwriting style of the date and payee lines in all four (4) instruments bear several common traits and appear to have been completed by the same hand (See Exhibit F). This irregularity is similar to the discussion under 1, except the style of handwriting is that of a different hand. The unique characteristics associated with this handwriting style are:

- (1) The "D" in the December is written in the same open distinctive style.
- (2) The use of the number "7" in 79 with a bar, sometimes referred to as a European 7.
- (3) On the payee line, the "t" and "z" in Citizens and the "F" in For are written with bars across each letter.

Other characteristics may be developed but those discussed are readily apparent to the untrained eye and appear on all four (4) instruments.

2/ For a detailed, albeit lay, analysis of the handwriting irregularities for the above-mentioned person, et al., see the attached Audit report.

3/ The money orders possessed several of the characteristics which were determined to be probative in MUR 1158, which dealt with the third CFL submission from Maryland.

Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

- b) The Bank of New York - Three (3) contributors made contributions by money orders drawn on the above bank (see Exhibit G). There does not appear to be any common characteristics in the handwriting styles when comparing the three (3) money orders; however, the Audit staff has noted the following:

- (1) The money orders are consecutively numbered (WE 305 180-181-182);
- (2) The money orders are dated December 11, 1979;
- (3) The money orders are for \$200; and,
- (4) "Buffalo" is written on the lower left corner of each money order.

Furthermore, money order #WE 305-181 which bears the signature -Joyce H. Rubinstein - has the same common characteristics as the four (4) Chase Manhattan Bank money orders described in Section 2a, which are also from contributors living in the Buffalo area. Committee records indicate that Joyce H. Rubinstein is a CFL representative.

In sum, there is a suspect sameness in some documents, and, conversely, a suspect difference in handwritings which should be the same. In addition, the fact of sequential numbering of some of the money orders is suspicious. At this time, the persons responsible for the above described irregularities is difficult to ascertain. For this reason, we are recommending that an investigation of these matters be conducted by this office pursuant to 26 U.S.C. § 9039. To initiate the investigation we are seeking authorization from the Commission to take the depositions of the 23 individuals involved. The results of the investigation may point to violations of 26 U.S.C. § 9042(c) and 2 U.S.C. § 441f.

In MUR 1186 the Commission's investigation is being obstructed by CFL's refusal to turn over documents and to be questioned in connection with the facts surrounding the submission of an Oregon money order attributed to Harold M. Harper. Mr. Harper has stated in an affidavit that he never purchased a money order payable to CFL. This situation is almost identical to one of the fact patterns uncovered in MUR 1158.

MUR 1186 developed out of Mr. Harper's response to a letter sent by the Commission seeking confirmation of a money order purportedly signed by Harper payable to CFL. This suspected money order was one of twelve resubmitted by CFL to meet the threshold requirement

Memorandum to the Commission

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Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

in Oregon. Of the twelve confirmation letters sent, this Office has not received a response from six of the individuals. ^{4/} Thus, this Office recommends that the Commission authorize subpoenas be issued to the six individuals who failed to respond to the confirmation letter.

In addition to the failure of the six individuals to respond to the Commission's letter, this Office has not been unable to verify that two contributors which LaRouche submitted to qualify Ohio as a threshold state are residents of Ohio. The post office has returned the Commission's letters as undeliverable, and a check of the criss-cross directory seems to suggest that no one by the name of any of these contributors lives at the reported address. This Office will continue its investigation to determine the residency of these two purported Ohio contributors.

In MUR 1202 which involved a finding of reason to believe that an individual made a contribution in the name of another, this Office has some information that no violation of the Act has occurred. This Office is awaiting further information before proceeding.

Analysis

At this early stage a pattern is appearing that puts into question many of the money orders and cashier's checks submitted by CFL for matching fund payments. However further investigation and review is necessary in order to ultimately demonstrate that CFL has not met the required criteria to establish eligibility for matching fund payments and to support a repayment determination pursuant to 26 U.S.C. § 9038(b)(1). This section states:

If the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034, it shall notify the candidate, and the candidate shall pay to the Secretary an amount equal to the amount of the excess payments.

^{4/} See Memorandum, Analysis of Threshold Submission for Lyndon A. LaRouche, Jr. These twelve money orders were brought into question when they were resubmitted signed on a Monday after being rejected on the preceding Friday for not containing the requisite signatures.

Memorandum to the Commission -

Page 6

Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

If the Commission established evidence of fraudulent contributions in the threshold submission which were necessary to establish LaRouche's eligibility to receive matching fund payments, the Commission could sustain a repayment of the entire amount certified. Moreover, this Office is conducting further research to determine whether the Commission could sustain a repayment of the entire amount of matching funds certified if there was evidence of fraud in contributions which were not necessary to establish eligibility, (e.g. fraud appearing in subsequent submissions). The Commission may also assess civil penalties where appropriate, including penalties pursuant to 26 U.S.C. § 9042.

Proposed Action

The Commission has broad powers to conduct investigations which it determines to be necessary to carry out its responsibilities under the Presidential Primary Matching Payment Account Act. Committee to Elect Lyndon LaRouche v. Federal Election Commission, 613 F.2d 834, 843 n. 16 (D.C. Cir. 1979). Specifically, the Office of General Counsel recommends the Commission authorize the following actions:

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.
2. 100% review by the Audit Division of the following five threshold states: Maryland, Virginia, Ohio Oregon and Missouri. 5/

5/ According to the Audit Division a 100% review would include:

1. review of all written instruments and associated documentation presented, including various "sorts": dates, serial numbers, issuing institution, amounts etc.;
2. review of all contributor list items including various "sorts": name, address, date, amount occupation, principal place of business;
3. interface with information gained in the fieldwork phases of the audit;
4. interface with information gained during the various MUR actions;

Memorandum to the Commission.

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Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

3. Authorize the taking of the following depositions:

Paul Greenberg
Theresa Seiler
Robert Hart
Janice Hart
Joyce Rubinstein
William Lerch
Melvin Klenetsky
Robert Pierce
Victoria Lacy
Elliot Eisenberg
Shaw Waffle

Ronald Bettog
John Braur
Mitchell Hirsch
Gerald Pecheuik
Kirby Ashley
Sander Perety Friedman
Matthew Gruice
Denise Ham
Linda Fisch
Jennifer Roe
Khaxbro Ghandhi
Roger Ham

It is the opinion of this Office that Commission authorization to proceed with the above-listed actions coupled with the ongoing investigations arising from the confirmation letters and depositions in MURs 1158 and 1186 afford the most productive and efficient use of Commission resources and is designed to provide evidence that Lyndon LaRouche should not have been certified to receive matching fund payments.

An analysis of all cashier's checks and money orders might result in further evidence that contributions submitted for matching were fraudulently produced or improperly attributed to individuals. See MURs 1158 and 1186.

A 100% review of Virginia, Oregon and Missouri is proposed because these three were resubmission states for threshold certification. A 100% review of Maryland is proposed since the violation uncovered in MUR 1158 arises out of Baltimore, Maryland. Ohio is proposed because of the failure to confirm the mailing addresses of two Ohio contributors necessary to qualify Ohio as a threshold State.

5/ Continued

5. review of selected daily deposit batches contained in matching fund submissions;
6. Comparison of selected items to information disclosed on Committee's disclosure reports, for example: loans, contribution refunds made, other adjustments to contributions received; and
7. other procedures arising out of patterns established during review of items one through six.

Memorandum to the Commission

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Report on Various Matters Concerning Citizens for LaRouche
(including request for authorization to issue subpoenas for
deposition)

Recommendations

1. An analysis by the Audit Division of the entire CFL submission with respect to bearer instruments.
2. 100% review by the Audit Division of the following five threshold states: Maryland, Virginia, Ohio Oregon and Missouri.
3. Authorize the taking of the following depositions:

Paul Greenberg
Theresa Seiler
Robert Hart
Janice Hart
Joyce Rubinstein
William Lerch
Melvin Klenetsky
Robert Pierce
Victoria Lacy
Elliot Eisenberg
Shaw Waffle

Ronald Bettog
John Braur
Mitchell Hirsch
Gerald Pechuik
Kirby Ashley
Sander Perety Friedman
Matthew Gruice
Denise Ham
Linda Fisch
Jennifer Roe
Khaxbro Gandhi
Roger Ham

Attachments

Audit Finding C
Attachments C - I
Authorization
Sample subpoena and letter

LAURA M. BRENNAN
OFFICIAL COURT REPORTER
UNITED STATES DISTRICT COURT
219 SOUTH DEARBORN STREET, ROOM 1918
CHICAGO, ILLINOIS 60604

02 JUN 7 A10:56

CC# 7904

PHONE: 312 - 427-4393

June 2, 1982

2 JUN 7 P1:06

FEDERAL ELECTIONS COMMISSION
1325 J Street NW
Washington, D.C., 20463

Attn: Ms. Lois G. Lerner

Re: IN THE MATTER OF: CONTRIBUTIONS TO LYNDON LaROUCHE

Dear Ms. Lerner:

Enclosed is the original transcript of the deposition
of Gerald Rose, taken in the above-entitled cause on
May 3, 1982

It is our understanding that you will arrange to have
the witness read and sign the deposition and thereafter
return it to us for filing with the Clerk of the Court.

Thank you for your cooperation.

Very truly yours,

Laura M. Brennan

Laura M. Brennan

LMB/lk
Encl.

FEDERAL ELECTIONS COMMISSION
WASHINGTON, D. C.

IN THE MATTER OF:

CONTRIBUTIONS TO LYNDON LaROUCHE

TRANSCRIPT OF PROCEEDINGS

had in the above-entitled matter at 219 South Dearborn
Street, Chicago, Illinois 60604, on Monday, May 3, 1982,
at 2:30 o'clock p.m.

PRESENT:

MS. LOIS G. LERNER
MR. LAWRENCE M. NOBLE
1325 K Street NW
Washington, D. C., 20463

appeared on behalf of Federal Elections
Commission

ALSO PRESENT:

MR. MAYER MORGANROTH
Ms. Barbara Boyd

MS. LERNER: It is now 2:30 and the witness who has been subpoenaed to be deposed today, Robert Cole, has indicated through his attorney to Mr. Morganroth that he will not be appearing today or for his deposition tomorrow because he has retained new counsel.

Therefore, we are terminating this deposition, however, we reserve all rights.

MR. MORGANROTH: For the record I previously represented Mr. Cole.

On this day I have visited his new counsel, Gary Abrams, who informed me that he is going to appear for Mr. Cole. I signed a consent for substitution for him to represent him in the civil case and also he informed me he was writing Washington, the Federal Elections Commission, to inform them of the fact that he is going to also be representing Mr. Cole in the enforcement proceedings.

He also instructed me at that time that they do not intend to appear this afternoon. They are not prepared because he recently has been retained and instructed me to tell the attorneys for the Federal Elections Commission that he will submit his client for deposition at a convenient date to both sides.


FEDERAL ELECTIONS COMMISSION
WASHINGTON, D. C.

IN THE MATTER OF:

CONTRIBUTIONS TO LYNDON LaROUCHE

CERTIFICATE

I HEREBY CERTIFY that the proceedings had in the above-entitled cause on Monday, May 3, 1982, were reported in shorthand, and later transcribed into type-writing under my direct personal supervision; and that the foregoing pages, number 1 through 2, are a true, correct and complete transcript of the official shorthand notes so made as aforesaid.


Notary Public
State of Illinois

My commission expires

August 10, 1985

771555

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:
UNITED STATES LABOR
PARTY, et. al.

: 77 MAY 11 AM 3:37
:
:
:

Oral Deposition of DONALD C.
YORK. taken pursuant to notice in the Federal Building,
9th and King Streets, Wilmington, Delaware, on Wednesday,
April 27, 1977, beginning at 3:05 p.m., before a Court
Reporter/Notary Public there being present:

APPEARANCES:

DAVID R. SPIEGEL, ESQUIRE
BIZ VAN GELDER, ESQUIRE
Attorneys for the Federal
Election Commission

DONALD C. YORK

EXHIBITSPAGE

Exhibit 1	A personal money order made out to "Committee to Elect LaRouche" signed by Donald C. York dated 10/4/76	13
Exhibit 2	A 5-page document entitled "Federal Election Commission Statement Form," signed by Donald C. York dated 1/26/77	16
Exhibit 3	A check for \$7.00 made out to "Committee to Elect LaRouche" signed by Donald C. York dated October 17, 1976 and a receipt for \$5.00 made out to Donald C. York from the "Committee to Elect Lyndon LaRouche."	21

DONALD C. YORK

...Donald C. York, having
been first duly sworn, was examined and
testified as follows:

BY MR. SPIEGEL:

Q Could you state your full name for the record.

A Donald Carl York.

Q What is your address?

A Present or home?

Q Your present address.

A 403 Dickinson Hall C, Newark, Delaware, 19711.

Q You're a student?

A Yes.

Q At what University?

A University of Delaware.

Q What is your address when you're not on campus?

A 115 St. Thomas Road, Lancaster, Pennsylvania, 17601.

Q Is that your full residence year around?

A Yes.

Q Could you state the date on which you first became
or were approached by the United States Labor Party - - let me
rephrase that question. Are you familiar with an organization
called the United States Labor Party?

A Yes.

Q Could you state the date upon which you first
became aware of them.

A Approximately September the 10th.

Q 1976?

DONALD C. YORK

A Yes.

Q Could you describe how this occurred, how you became involved, how you became aware of them?

A Well, I went to buy books at the student center and outside there was a table set up with literature, a person selling it. I had seen these people before so I decided to talk to them and he asked me what my major was.

Q When you say he, who do you mean by he?

A Anthony Esposito. He asked me what my major was and I told him I was a math major so he showed me a booklet on contour, the originator of said theory contour.

Q Were there any other individuals there at that time whose names you remember?

A No. He was the only one there.

Q C. K. Now, did you at any point actually join the United States Labor Party?

A Not in my mind. I once - - I - - I once asked for donations amongst the people in the Labor Party. It's supposed to be dues so I paid but that was one time and I never really thought about joining.

Q Are you familiar with an organization called The National Caucus of Labor Committees?

A I had seen the name on their publications.

Q On whose publications?

A Labor Party.

Q Are you in any way familiar with the group?

A Well, some of the people in the Labor Party are

DONALD C. YORK

also members in NCLC.

Q NCLC is another name for the National Caucus of Labor Committee?

A Yes. And one of them had lectured on this contour thing. He was the one that wrote it.

Q Do you remember the names of any of the people who were members that you say of both groups, United States Labor Party and the National Caucus of Labor?

A Uwe Partpart, U-W-E P-A-R-T-P-A-R-T.

Q You're not sure of the spelling?

A No, not the last name.

Q Was Henry Moss - - is the name Henry Moss familiar to you?

A Yes.

Q Was he a member to the best of your knowledge to these two committees?

A I don't know.

Q Did there come a time after September or after September 10, 1976, when you did any activities or did any work for the United States Labor Party?

A I sold newspapers.

Q Did you do this with any other persons?

A Yes.

Q What were those persons' names?

A I started right out with Christine Douglas and Phil Valenti.

Q Could you spell the names for the record, if you

DONALD C. YORK

1 know how to spell them?

2 A Which one? Valenti?

3 Q Both.

4 A Douglas, D-O-U-G-L-A-S and V-A-L-E-N-T-I.

5 Q Were these people that you met for the first time
6 after you joined or after you became a member of the United
7 States Labor Party?

8 A I don't admit to ever being a member of the US
9 Labor Party.

10 Q Well, those persons that you met after September
11 10, 1976 - -

12 A Pardon me. The question?

13 Q Were these persons that you met after September
14 10, 1976, when you first heard of that math seminar?

15 A Yes.

16 Q What was the name of the newspaper that you sold?

17 A New Solidarity.

18 Q How much did it sell for?

19 A For 25 cents a copy.

20 Q About how many occasions did you sell that?

21 A Well, there were two occasions - - no, three
22 occasions which I had sold anything. Usually I didn't sell
23 anything.

24 Q To the best of your knowledge was Valenti able to
25 sell any copies of this newspaper?

A Yes.

Q How many copies approximately? How many copies?

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WILMINGTON, DELAWARE

13023 898-8842

DONALD C. YORK

A He usually did about 30 per day.

Q Did you do any other work for the United States Labor Party?

A One time I was asked to see if some people could go to a Beethoven concert.

Q Did you form any campus groups for the United States Labor Party?

A Not myself. I was just a figurehead for the Fusion Energy Society. I never did any actual organizing for that myself.

Q Was this a group that conducted any meetings that you can remember?

A Yes. Only when I attended there was only one person who was not a member of the Labor Party present and he left about half way through because there wasn't anything being talked about that related to fusion. It was mostly the ideology of the Labor Party.

Q Is this only meeting you attended or is - - did you attend other meetings?

A That was the only one. It was still in its trial stage.

Q Did you attend any other meetings of the United States Labor Party on the Delaware campus?

A No.

Q Did you attend any other meetings of the United States Labor Party?

A Yes.

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WILMINGTON, DELAWARE

(302) 655-5547

DONALD C. YORK

Q Where were these held?

A Philadelphia.

Q During the course of these meetings, did the subject of Presidential candidacy of Lyndon LaRouche come up at any point?

A Yes.

Q Could you describe the dates of the meetings, if you remember them, at which the matter was discussed.

A Well, it was at all of them from the first time I had gone until the last on Sundays. I don't remember any specific dates.

Q These meetings that you talk about were always held on Sunday?

A Yes. It was called the Sunday Briefing. Most of the people didn't work then. Well, they would all get together and sell papers during the day and then at night they would talk usually from about 8:00 to 12:00 - - no, 8:00 'til 10:00, 10:30.

Q Where were these held?

A Labor Party office in Philadelphia. It was on 34th Street.

Q Do you remember the exact address by any chance?

A No.

Q During the course of these meetings, did the subject of contributions to the LaRouche campaign for Presidency come up?

A Well, I've been told that they were matching funds

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DONALD C. YORK

and for every dollar contribution that they got up to \$250, if they got a \$100,000 in all, then the Government would match it dollar for dollar.

Q Was anything else brought up?

A Not at that point.

Q When you say not at that point, what do you mean?

A The first time I had heard about it.

Q Which is when?

A I don't remember the exact date.

Q Was it shortly after - -

A Shortly after I joined, yes.

Q Shortly after your contact on the campus?

A Yes, contact.

Q Did there come a time when you were asked to contribute money to this LaRouche campaign?

A Yes.

Q Do you remember the name of the individual that asked you about this?

A Henry Moss.

Q Could you spell the name, please.

A M-O-S-S.

Q Could you describe the substance of the conversation that took place and the date if you remember it?

A Well, it was the date of the Fusion Energy Society meeting, which I had spoken of earlier that I attended.

Q When was that?

A I don't know but I'm sure the club's committee at

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the college could help you with that. If you want to have an investigator ask. I have no idea really.

Q What did the two of you discuss?

A Well, like I said, the only non-Labor Party member who was there had left and they're amongst friends so they had asked another person before me about it. They said I want to give you \$250. So I figured it was sort of like helping them out because this person was very old and they said it was for the LaRouche campaign. So then he asked me afterwards.

Q This other person asked you?

A No. It was still Henry Moss who asked me.

Q He asked you personally to give you \$250?

A Yes.

Q Do you remember the other person who was involved in this?

A Leroy Jones.

Q What did Moss tell you to do with the money?

A He told me that he wanted me to write out a check to the committee to elect LaRouche and put the money in my bank account and to give them the check but he didn't have the money at that date.

Q Did you give him any money at that time?

A No, I didn't give him any money.

Q Did there come a time when you actually made a contribution of money to the La Rouche Presidential campaign?

A Well, usually I didn't carry any money along. So when I was in Philadelphia, I used to get hungry so I'd ask

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2 them to cash checks for me, give me money in exchange for the
3 checks. They always told me to write out to LaRouche and also
4 to the concert. I think I wrote out a check for \$5.

5 Q Well, let's go back to that \$250 check. Did there
6 come a time when you gave \$250 to the LaRouche Presidential
7 campaign?

8 A One time when I was at Philadelphia before I came
9 back, they gave me a brown paper bag full of money.

10 Q Do you remember about when this took place?

11 A I would say about October 3rd.

12 Q You say you were in Philadelphia. Was that for
13 a meeting of the United States Labor Board?

14 A That was for one of those Sunday Briefings.

15 Q How did you get to Philadelphia for these briefings?

16 A Leroy Jones would drive me back and forth. We
17 usually went up for the afternoon.

18 Q Did you discuss the contribution with him in any
19 way?

20 A The \$250 one?

21 Q Yes.

22 A No.

23 Q Did the matter of contributions ever come up in
24 general with Leroy Jones?

25 A With who?

Q With Leroy Jones.

A No. I never talked to him about it. He knew
that I had it.

DONALD C. YORK

Q Was he an associate of Mr. Moss?

A Well, he openly stated to me that he was a Socialist and he was a member of the US Labor Party.

Q Did he tell you that he was a friend of Mr. Moss?

A No.

Q O. K. At these Sunday Briefings was there any one person that conducted these briefings?

A It was usually Henry Moss would sit up in front of the group and they would pull up chairs around in a semi-circle, listen to what they had to say.

Q Did Henry Moss have a title that you can remember?

A One time he ran for Congress but he didn't make it so he didn't have a title.

Q About how many people attended these meetings?

A About 30.

Q About how many people were at that meeting which - - at which you say the - - that contribution that you made came about?

A About 25.

Q About 25. Can you identify any of the persons who were at that meeting?

A Not their whole names but most of them. I knew all their first names.

Q Could you state for the record - - let's start with the ones whose last names you knew. Can you state for the record the names of any persons you can remember who were at that meeting?

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1 A Christine Douglas, Steve Douglas.

2 Q How did you know Christine Douglas?

3 A Well, when I went to go to the mathematics meeting
4 after I initially talked to Mr. Esposito, she was the second
5 person I had met from Philadelphia. She called me up and told
6 me she had arranged for a ride for me to Philadelphia so I
7 could attend this math meeting. She said she and Phil Valenti
8 would be there.

9 Q Was Phil Valenti another person who was there?

10 A Yes, I think so.

11 Q O. K. Anybody else?

12 A Anthony Esposito, Sam Cinger, C-I-N-G-E-R.

13 Q Was there a woman named Fran at this group?

14 A Yes, she gave me money.

15 Q She gave you the money?

16 A Yes.

17 Q Did she have some position in the United States
18 Labor Party?

19 A She seemed like the secretary. She would usually
20 count the money from the Solidarity sales.

21 Q Solidarity was the newspaper of the United States
22 Labor Party?

23 A Yes, New Solidarity.

24 Q This is the one you were selling?

25 A Attempting to sell.

Q What happened to the money you got from the sales
of that newspaper?

DONALD C. YORK

A Well, after we were done at one location, they'd ask how many I sold and at the end of the day I'd give them all the money.

Q Did they say what they would do with the money?

A No. Use it for publication costs.

Q Did they at any time mention the LaRouche Presidential candidacy?

A Yes.

Q Did they mention any connection between this money and LaRouche Presidential candidacy?

A No.

Q I'm going to show you a copy - - a Xerox copy of a document that says at the top "Personal Money Order," and has a signature, "Donald C. York," at the bottom and is made out from the Farmers Bank. Do you recognize a copy of this?

A Yes.

MR. SPIEGEL: Could we have that marked in identification as Exhibit No. 1.

(Whereupon, the Court Reporter marked Exhibit No. 1 for identification.)

BY MR. SPIEGEL:

Q What did you use this money order for?

A Well, I myself didn't use it. I gave it to Phillip Valenti on the date on here. He came that same night. What was the date? October 4th. He came that night.

Q O. K. What are the circumstances following with how this money order was transacted?

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A Well, after they had given me the money and I had it in my room at the dorm - -

Q Well, when did they give it to you?

A It was Sunday night, October 3rd.

Q So it was the night of this meeting?

A Yes, the second night.

Q Did they give it to you at the meeting?

A Yes.

Q Who gave you the \$250?

A Fran. She was the one that told me to use the money, take it.

Q Could you describe the circumstances under which she gave you the money?

A Well, they had two rooms. One's a little office and the other one's where they hold the meetings. So they count the money in the office and that's sort of away from the other room. They had a bag and said it's not quite \$250 yet but we'll count the rest of it out and make sure it's all there.

Q So was there anyone else present at that time?

A I forget who was in the office. They came in and went out. So they had the meeting and afterwards it was time to go. I picked up the money and - - well, there were lots of quarter rolls and dime rolls and nickel rolls and there was a McDonalds down the street where we change our quarter rolls into bills. Instead of carrying a couple pounds of quarters, I went down to the McDonalds with \$60 in quarter

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rolls. There were 80 in all but that's all I could carry at the time.

Q Did anybody else to your direct knowledge get any money at that meeting?

A No.

Q Did Mr. Moss at any time ever mention to you any other individuals getting money?

A Leroy Jones - - no, he didn't say that he had gotten it but - -

Q What did he say?

A Well, at that meeting he had asked Leroy Jones before me and afterwards I'd asked - - well, sometime later I asked Leroy Jones why he didn't get it - - how much did he get and he said \$250.

Q Did he explain how he gave it to her?

A No.

MS. VAN GELDER: Off the record.

(Whereupon, a discussion was held off the record.)

BY MR. SPIEGEL:

Q Donald, I'm going to show you a copy of a document that is marked "Federal Election Commission Statement Form," and has your signature on it and has several pages, in fact, five pages. Is this document familiar to you?

A Yes.

Q Could you describe generally what this document contains?

A Mostly what I have said here.

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Q What in particular is this?

A It describes my involvement from the start, some of the activities I had done, and also the matter pertaining to the \$250.

MR. SPIEGEL: Let's have this marked for identification - - before we do that. Is this signature at the bottom of the document your signature?

THE WITNESS: Yes.

(Whereupon, the Court Reporter marked Exhibit 2 for identification.)

BY MR. SPIEGEL:

Q On Page 3 of the document you refer to a woman named Becky - -

A Yes.

Q - - who gave you \$250 in a brown paper bag.

A That was a mistake. It was Fran.

Q It was Fran?

A Yes. I had my people mixed up at the time.

Q Was this woman Becky involved in any way with this \$250?

A No.

Q Now, what happened after you got the \$250?

A Well, Leroy Jones drove me home, back to Delaware, and I left it in my room. I went to my morning class and during the afternoon I tried to put it into the Farmers Bank of Delaware but my checking account was with Farmers First of

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Pennsylvania so I couldn't deposit it. So I called Mr. Moss and I told him not to cash the check because it would bounce because I couldn't get the money in. So he told me that I should get a money order. So I went back to the Farmers Bank branch and I bought a money order.

Q You didn't have an account at Farmers Bank?

A Not at Farmers Bank of Delaware, no.

Q Did you know if the United States Labor Party had an account at that branch?

A No.

Q You don't know?

A No.

Q Did anybody direct you to go to that branch or is that your own idea?

A Well, it was in the basement of the student center so that was the only bank I knew there was.

Q What happened after you got the \$250 money order?

A Well, I took it back to my room and I hid it and I waited for Valenti to come because Henry Moss had told me this: he had talked to Valenti. He was in Delaware to pick up the money and he would talk to him when he called in and tell him to come and get it.

Q Did you have any conversation with Valenti when you gave him the money?

A No. There was a woman with him and she did all the talking at this time.

Q Do you know who this woman was?

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A I think her name was Robin.

Q What did she say?

A I never really met her before. She talked small talk. My roommate was in the room at the time. So I just gave him the money order and nothing was said about it.

Q Now, at this meeting at which you got the \$250 was the matter of Federal matching money to the LaRouche campaign discussed?

A No. Beforehand it was but not when they actually gave it to me. It was the same idea what it was for.

Q When you were given the money, were you aware of what it was for?

A Yes.

Q Was the matter of Federal matching payments ever explained to you prior to the time you got the money?

A At the meeting of the Fusion Energy Society.

Q Which was before this meeting?

A Yes.

Q Was it explained to you how Federal matching money works?

A No. They just match dollar for dollar once the amount of \$100,000 is reached.

Q Were you under the impression that this money would be used towards Federal matching money?

A Yes.

Q Did you at any other time have occasion to make out any checks or money orders or any instruments to the United

DONALD C. YORK

States Labor Party?

A They told me they assigned me to a committee to elect LaRouche. This was like I said, I took checks along instead of carrying money so that I could buy food at various food places, McDonalds, places like that.

Q Who is the person whom you gave these checks to?

A It was usually Fran. Like I said, she handled all the money that I noticed.

Q Did she say what she was going to do with the checks?

A Well, she would use it to try to get matching funds but I didn't see what they would do because the \$250 I had already given and I knew that couldn't help towards the \$100,000 because the match was 250 per person. The maximum was \$250 per person.

Q I'm going to show you a copy of two documents. One has the name "Donald York" on top and it is a check for \$7 and the other has the title "Committee to Elect Lyndon LaRouche" on top and it says "Received of Donald York sum of \$5." The first document is dated October 17 and the second is dated October 18 and each have a signature Donald C. York on it. Are these two documents familiar to you?

A I guess so. They're kind of blurred. I don't remember when I wrote them.

Q Are these the types of documents that were made out when you had travel expenses or any expenses in Philadelphia?

A I believe so. Oh, yeah. This is what I had done

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for the contribution of which I had spoken is for \$7 and asked for five and I asked them if they would cash a check for me so I could have \$2 to get something to eat. So they were asking for their contributions from the members for dues so I wanted to pass these checks off on them to get some money to go for food. So I figured why not because they probably would wonder why he has this check and he's not going to make a contribution. I had taken the check along to buy some food at the end of the day.

MR. SPIEGEL: Could we go off the record for a second.

(Whereupon, a discussion was held off the record.)

BY MR. SPIEGEL:

Q These two documents that you have in front of you to the best of your recollection are they for separate contributions?

A Yes.

Q When we use the word "contribution," was that specifically money you intended for the LaRouche Presidential campaign or was it something else?

A Repeat the question, please.

Q Was this money on these two receipts monies you intended for the Presidential Committee to elect Lyndon LaRouche or was that something else?

A Well, they just told me to do it. I asked them who should I make this out to, can I have a name, cash. They told me LaRouche. I didn't see what good it would do because

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of the \$250 given on October 4th.

Q Was it your impression that this money was being given to you for something other than a contribution?

A No.

Q Expenses?

A What do you mean? The Labor Party expenses?

Q No. Your expenses for coming down to Philadelphia.

A No.

Q Did you at any point collect any or solicit, collect or solicit, any contributions for the LaRouche Presidential campaign?

MR. SPIEGEL: Let's identify these as Exhibit 3 for the record.

(Whereupon, the Court Reporter marked Exhibit 3 for identification.)

MR. SPIEGEL: Read back the last question.

(Whereupon, the Court Reporter read back the following:

"Q Did you at any time collect any or solicit, collect or solicit, any contributions for the LaRouche Presidential campaign?"

THE WITNESS: What does solicit mean?

BY MR. SPIEGEL:

Q Did you at any point ask people for money for the LaRouche Presidential campaign?

A O. K. One time we were out selling our stuff

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1 through a neighborhood in Philadelphia and it was pretty close
2 towards election and they figured that the people might like
3 to give money to the LaRouche election. And seeing how it was
4 so close, this would be the best time. So they told us if we
5 had somebody with an interest to ask for contributions. So
6 there was only one person I met like that, a lady and a man,
7 and they seemed extremely interested. I don't know the name
8 but he looked like a working man, but the wife looked like the
9 one who was interested. So I said buy a paper and I said it
10 was 25 cents and she gave me 25. After I asked if they would
11 like to give me a contribution, he said give me a dollar.

12 Q What happened to the monies after you got them?
13 Who did you give it to?

14 A Well, at that time I guess I went out with a lot
15 of people I really didn't know, not people like Moss or Valenti.
16 I forget the most important person along at that time who I
17 gave the money to.

18 Q Did you at any point have contact with persons who
19 worked for the Committee to Elect Lyndon LaRouche as President?

20 A Yes.

21 Q Were these persons who were also associated with
22 the United States Labor Party?

23 A I don't know. I hadn't met them before.

24 Q When was the last meeting of the United States
25 Labor Party or any other group associated with the LaRouche
campaign that you attended?

A November the 3rd.

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Q Where was that?

A Philadelphia.

Q Have you had any contact with persons who are in the United States Labor Party or the Committee to Elect LaRouche or National Caucus of Labor Committee since that time?

A One time. It was the day that your agents came to see me, earlier in the day.

Q When you say your agents, do you remember about what date that was?

A No, I don't.

Q What was the substance of the conversation?

A Well, they had asked me to come to the student center where they were selling papers and I had turned them down. Well, I didn't turn them down. I had not gone when they had asked me beforehand but I figured I had better go now because if I kept turning them down, they might not like it or something so I went. And she told me that they were moving and also that they had another concert coming up, to try to - - she asked me if I would get the same people to come to that one who came to the last one and then she had told me about how the people in Delaware were being harrassed by some agents, how Leroy Jones had been confronted at his front door by them briefly and that if they came, I should just not let them in my room. Just say if you want - - well, if this is an audit, you have to get a court order or something like that, that she couldn't audit me. So I just wouldn't let them in my room and they couldn't do anything to me. Also that if they persisted, Mr.

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Moss was working on some kind of harrassment charge through the local police to make them cease and desist.

Q Was this before the meeting that you had with the Federal Election Commission investigators?

A Yes. This was during the afternoon and they came at night.

Q Did you speak to any of those persons with which you were previously dealing in the Labor Party or any of the other groups that we talked about after the day of this meeting with our investigators?

A No. They called me several times but usually you go to their Fusion Energy meetings but I had never gone to any.

MR. SPIEGEL: Off the record.

(Whereupon, a discussion was held off the record.)

BY MR. SPIEGEL:

Q You described certain persons who spoke to you before you spoke with the Federal Election Commission investigators. Do you remember their names?

A It was one person. Her name was Becky. But I don't know what her last name was. She was prominent in the Fusion Energy Society. I've seen her name on some of the handbills on the walls for the Fusion Energy Society meetings.

Q Have you had any other contacts with this Becky on any other occasion?

A Beforehand?

Q Yeah.

A She was usually the person who was the spokesman.

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with the Fusion Energy Foundation from what I could tell.

Q Donald, let me take you back to one other point in this Deposition, just one last set of questions. You say there were two rooms from which the Labor Party meetings were held in Philadelphia; am I correct on that?

A Actually it was sort of like one huge room and part of it was partitioned off by a wall.

Q Am I correct that that second room was the room in which you received the \$250?

A The small room.

Q The small room?

A Yes.

Q Do you know if any other money was given out in that room?

A No.

MR. SPIEGEL: O. K. I have no further questions.

(Whereupon, presentation for reading and signing waived.)

(Whereupon, the Deposition was concluded at approximately 3:55 p.m.)

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A F F I D A V I T

I, DONALD C. YORK, hereby certify that the foregoing 27-page testimony herein given by me is true and correct to the best of my knowledge and belief.

S/ _____
DONALD C. YORK

DONALD C. YORK

C E R T I F I C A T E

I, Debra Moore, Court Reporter - Notary Public, do hereby certify that the foregoing Deposition of Donald C. York, taken pursuant to notice in the Federal Building, 9th and King Streets, Wilmington, Delaware, on Wednesday, April 27, 1977, beginning at 3:05 p.m., was reported by myself in shorthand and typed under my direction and control; that the foregoing pages 1 through 25, inclusive, is a true and correct transcript of the proceedings.

Debra Moore
Debra Moore

FEDERAL ELECTIONS COMMISSION

WASHINGTON, D.C.

IN THE MATTER OF: MUR 1352

DEPOSITION OF ROBERT J. COLE, taken on
discovery, pursuant to agreement of the parties herein,
taken on June 10, 1982 at 219 South Dearborn Street,
Room 1639, Chicago, Illinois 60604, at 11:30 a.m.

APPEARANCES:

ABRAMS, GOMBERG & REESE, LTD.
(135 South LaSalle Street, Suite 2610
Chicago, Illinois 60603) by
MR. GARY D. ABRAMS

and

MAYER MORGANROTH
(24901 Northwestern Highway
Suite 555 Heritage Plaza
Soutfield, Michigan 48075)

appeared on behalf of the Plaintiffs;

FEDERAL ELECTION COMMISSION
(1325 K Street, N.W.
Washington, D.C. 20463) by
MR. LAWRENCE N. NOBLE and
MS. LOIS G. LERNER

appeared on behalf of the Defendant.

ALSO PRESENT:

MS. BARBARA BOYD, Assistant to Mayer Morganroth.

ROBERT J. COLE,
called on behalf of the Defendant, after first being
duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

MS. LERNER: Before we start the questions
I'd like to make a couple of statements for the record.

First, I'd like it to be noted that ordinarily
in an enforcement action the counsel for respondent is
not permitted to attend the deposition. However, in
this case we have Mr. Morganroth here representing the
respondent and that is fine with us.

BY MS. LERNER:

Q In addition, Mr. Cole, I may ask you some of
the questions that you asked in the previous deposition,
however, this is an enforcement deposition which is
totally separate from the last deposition that you
participated in so therefore I have to make a complete
record. I hope you understand if I ask you the same
questions.

Also, I will assume unless you indicate other-
wise that you understand the question that I ask you.
If you do not understand it please feel free to indicate
that to me and I will try and rephrase it.

State your full name for the record please?

Cole - direct

A Robert J. Cole.

Q Your address?

A 1420 West Summerdale.

Q How long have you resided there, Mr. Cole?

A Since March 1st.

Q How old are you, Mr. Cole?

A Twenty-four.

Q Are you presently employed?

A Yes.

Q Where are you employed?

A Illinois Computype.

Q What are your duties there?

A Represent accounts.

Q Were you employed before that, before the
Illinois Computype?

A Before being there?

Q Yes.

A Sure.

Q Where were you employed?

A Swedish Covenant Hospital.

Q Are you represented by counsel here today?

A Yes.

Q Who is your counsel?

A Gary Abrams.

Cole - direct

Q Mr. Cole, you have been called here as a witness in the Federal Election Commission investigation into possible violations of election law by Citizens for LaRouche and others.

Were you aware of that investigation prior to today?

A Yes.

Q How did you become aware of the investigation?

A I can't remember what I said before, but the most recent thing has been I got a little card in the mail saying there was a registered letter for me which was never picked up and had been returned.

Q How did that make you aware that there was an investigation of the Federal Election Commission concerning LaRouche?

A By the Federal Election Commission?

Q Right. Let me start over again.

Prior to today were you aware that the Federal Election Commission was investigating possible violations of the election laws by Citizen for LaRouche?

A Yes.

Q Do you recall how you became aware of that?

A Well, like I said there was that thing in the mail.

Cole - direct

Before that, I, you know, naturally knew about this lawsuit in which I was a plaintiff. That is about it.

Q Had you ever discussed the fact that the Federal Election Commission was investigating Citizens for LaRouche or anyone?

A No.

Q The card that you referred to that came to you in the mail, when did that come to you?

A About a month ago.

Q Are you familiar with Linden LaRouche?

A I know of him by name.

Q When did you first learn of him?

A Beginning of or end of 1978.

Q How did you learn of him?

A I worked with a person in Milwaukee who made me aware of him.

Q Are you familiar with an organization by the name of Citizens for LaRouche?

A Yes.

Q How did you become familiar with that organization?

A End of '78, beginning of '79 I started work as a volunteer.

Cole - direct

Q The person that you knew in Milwaukee who introduced you to the name of Lyndon LaRouche, who was that person?

A His name was Terry Jones.

Q How did you become involved with Citizens for LaRouche?

A Just --

Q How did you become aware that the organization existed?

A He told me.

Q That was in '78 -- '79?

A Yes.

Q At that time were you living in Milwaukee?

A Yes.

Q Did you begin working for Citizens for LaRouche at that time?

A Maybe three months afterwards.

Q When you became associated with Citizens for LaRouche was that in Milwaukee or Chicago?

A First in Milwaukee.

Q Were you employed by Citizens for LaRouche or did you work on a voluntary basis?

A Volunteer.

Q Did you receive any pay?

Cole - direct

A No.

Q Did you work as a fund raiser for Citizens for LaRouche?

A Let's see. In the beginning, just a couple times.

Q Did you have a title while you were working for citizens for LaRouche?

A No.

Q What were your responsibilities while you were working there?

A Just keep, you know, let's see. Like I said, sort of logistics, keeping track of shippings in an out of literature. Sort of general office duties. Paper shuffling.

Q Were you ever involved in the solicitation of contribution collections?

A They wanted me to be but I was an extremely poor fund raiser.

Q Did you report to a supervisor while you were working there?

A Not really. Wouldn't call anyone there a supervisor.

Q Who was in charge of the Chicago office?

A It's hard to say.

Cole - direct

For political work I would say Gerry Rose.

Q You specifically say for political work.

For what other areas were people in charge?

MR. MORGANROTH: There has been no testimony anybody was in charge of anything except he said political work.

BY THE WITNESS:

A That was the nature of the campaign, was political work.

BY MS. LERNER:

Q The Chicago office was also involved in fund raising, was it not?

A Yes, to my knowledge, yes.

Q Was anyone in charge of the fund raising?

A The fund raising was naturally a part of the political work, as far as I remember.

Q Are you then saying that Gerald Rose was in charge of the fund raising?

A Not necessarily.

Q Who was in charge of the fund raising if anyone?

A No one that I can recall.

Q Was there an office hierarchy?

Cole - direct

A Not exactly.

Q Do you know a person by the name of David Hoffman?

A I remember him, yes.

Q Did Mr. Hoffman work in the office?

A He was there. I don't know whether you would call it work.

Q Was he a volunteer in the office?

A He was a volunteer.

Q What were his duties?

MR. ABRAMS: If you know.

BY THE WITNESS:

A Probably the same as any of us. It was always vague.

BY MS. LERNER:

Q Did Mr. Hoffman report to anyone in particular?

A No.

Q Do you know a gentleman by the name of Elliot Eisenberg?

A I remember his name.

Q Do you recall what Mr. Eisenberg's duties were?

A People did some of everything. There was no, nothing specific that I can recall what he did.

37003

Cole - direct

Q Do you still have contact with Mr. Eisenberg?

A I know him, yes.

Q Do you know where Mr. Eisenberg lives?

A I don't know his exact address.

Q Does he live in Chicago?

A I believe so, yes.

Q Do you know where Mr. Eisenberg is employed?

A I do.

Q Where is that?

A Illinois Computype.

Q While you were working as a volunteer for Citizens for LaRouche did you receive any instructions concerning either the solicitation or the collection of contributions?

A The first couple times in Milwaukee and that was it.

Q Who did you receive those instructions from?

A I don't remember. I don't even remember. I don't remember what the instructions were.

Q What was the procedure in the office when the contribution was received and brought to the office, what happened with it after that?

MR. ABRAMS: If you know. There has been no testimony at all that he knows whatever

Cole - direct

happened with the contributions in the Chicago office because he testified he wasn't involved in it in any way.

MS. LERNER: That is not what he said.

MR. MORGANROTH: If he doesn't know he can state.

BY THE WITNESS:

A I can't remember. I don't know.

BY MS. LERNER:

Q Do you know a person by the name of Victoria Lacey?

A I remember the name, yes.

Q Did Miss Lacey work as a volunteer at Citizens for LaRouche?

A As far as I remember.

Q Do you know a person by the name of Janice Hart?

A I remember her.

Q Did she also work as a volunteer at Citizens for LaRouche?

A From time to time.

Q When people made contributions to Citizens for LaRouche and brought them to the office would they ever bring them to you?

Cole - direct

A I would see contributions on top of the desk, yes.

Q What do you mean on top of the desk?

Can you explain that?

A Well, there was a central place, naturally, where people left their work that they finished and among that work sometimes was contributions.

Q Did people ever bring contributions to you?

A I from time to time as part of my general duties would count money. Whether or not it was contributions I'm not exactly sure.

Q Mr. Cole, were you in charge of finances for the Chicago office?

A I wouldn't say -- that is not exactly the term.

Q What is exactly the term?

A I did general work there. My responsibility as far as finance went as far as my intimate knowledge of a calculator.

Q Are you saying that you used the calculator while you were at CFL?

A I counted money.

Q Was that part of -- strike that.

How did you get the money that you counted?

A It was on the desk.

Cole - direct

Q Would you say that you headed up the financial matters in the Chicago office?

A No, not by any means.

Q Do you know why Victoria Lacey or Janice Hart would testify you were in charge of finances in the Chicago office?

MR. MORGANROTH: Object to him in any way having to characterize somebody else's testimony. He cannot read into other people's minds why they would say something. That is totally out of the question.

MR. ABRAMS: Objection.

MR. NOBLE: He may have some idea of what made them think that and if he knows he can enlighten us on why they would possibly say --

MR. ABRAMS: Still be conjecture.

MR. NOBLE: I think conjecture under certain circumstances is allowed. This is not a trial right now.

MR. MORGANROTH: It is certainly allowed when nobody objects, but it certainly isn't when somebody objects. We can't have him speculate as to somebody else's testimony in deposition or in trial.

MR. NOBLE: Mr. Abrams, are you instructing the witness not to answer the question?

MR. ABRAMS: If you know, answer.

Cole - direct

BY THE WITNESS:

A Just speculation on my part. If I am adding money with a calculator that is on the desk I guess they might assume that.

BY MS. LERNER:

Q Do you recall ever receiving any contributions directly from them?

A No. Directly from -- what do you mean?

Q From either -- let me rephrase it.

Do you recall any occasions where Victoria Lacey or Janice Hart brought contributions that they had collected and gave them to you?

A No.

Q Were there ever any credit card contributions taken in the office?

A Possibility, as far as I recall.

Q Do you ever recall receiving any credit card contribution information from anyone?

A I seem to recall, yes.

Q Who?

A I can't remember who.

Q Why would you receive that information?
Why would they give that information to you?

A As part of my general duties I would add it up,

Cole - direct

add up the figures.

MR. ABRAMS: Maybe you'd better explain what you mean by credit card information.

BY MS. LERNER:

Q On contributions, whatever information that was taken that was a credit card contribution made.

A What is the question?

Q You testified that there were credit card contributions taken in the office --

A As I recall from what I remember there was an account.

Q What do you mean there was an account?

A Citizens for LaRouche as far as I remember had an account.

Q What sort of an account?

A A campaign account.

Q And did they, when people solicited contributions for Citizens for LaRouche, did they ever receive contributions that were made on the contributor's credit card?

A Possibility.

Q Do you ever recall anyone giving you the information that was taken down, whatever information that was?

Cole - direct

A I was never -- I was involved purely in the figures aspect of the thing.

If there was credit card money raised perhaps there may have been a figure of how much they have been raised that day in credit cards.

Any information beyond that I never had access to.

Q Do you recall Victoria Lacey ever giving you any cash, checks or money orders that she had collected?

A There was nothing -- there was nothing that would lead me to believe that any individual, from the figures which I accumulated, that that was associated with any particular individual.

Q Do you recall any individual ever giving you, personally, cash, checks or money orders that they had collected?

A That they had collected?

Q As contributions?

A Not, no one in particular, no.

The money came from somewhere, obviously.

Q Did the people who made the -- do you recall the solicitors, people who solicited contributions giving that money to you?

Were you the person that they would go and

Cole - direct

bring it to you?

MR. MORGANROTH: Objection. Asked and answered three times.

MS. LERNER: Well he testified he didn't recall anyone doing that.

MR. ABRAMS: His last answer said anyone in particular, no.

MS. LERNER: He testified he did not recall anyone in particular when I asked him about Victoria Lacey.

MR. ABRAMS: If you want the reporter to read it back. After he said no, in particular, he said no.

BY MS. LERNER:

Q Did you have any understanding concerning the type of contributions that could be submitted for primary matching funds?

A No.

Q You never received any instructions concerning the form of the contribution that was acceptable for primary matching funds?

A Not that I remember.

Q Did you ever receive any instructions concerning the sending of the contribution records from the Chicago

Cole - direct

office to New York Citizens for LaRouche office?

A I don't remember being responsible for that.

Q What did you do with the contributions that had been collected at the end of the day?

A Sometimes, well a lot -- I would say the bulk of the time it was figures that I added up and that I generally didn't have access to the cash involved, if there was any cash.

Q What did you do after you added it up?

MR. MORGANROTH: With what?

BY MS. LERNER:

Q The figures.

A It was a sheet of figures which was, I left on the desk when I left at night.

What happened to that after that I don't know, I don't remember.

Q Who gave you the sheet of figures?

A It was a blank piece of paper.

Q You began by saying you were given a sheet of figures which you added up.

A No, no. I calculated figures onto a sheet of paper.

Q And you got these figures from where?

What were the figures representing?

Cole - direct

A They were figures which either were given to me previous by certain various categories or I would add up cash, if there was any, and periodically checks.

Q Where did you get the cash and checks and the other?

A They were on the desk.

In other words, I came in late at night. That is why I say that there was no association between who may have gathered contributions during the day and my knowledge of who they came from.

If there was cash there, if there were checks there I'd add them up and categorize them.

By category, cash or check, and that is all there was to it.

If somebody, if somebody had done that before me and had already categorized things I'd arrange them in columns and that is it.

Q So, are you saying that you'd come in late at night and the money would be laying on the desk with nobdoy else around?

A Well there were generally other people around. I came in before people left. Didn't want the money stolen.

Q It was just laying on a desk?

Cole - direct

A It was in an envelope. I don't think that is that unusual.

I might say it was neatly stacked on the desk.

Q Do you have any knowledge of what the people who were going out and soliciting these contributions were instructed to do once they had collected a contribution, with that contribution?

A What do you mean?

Q Do you have any knowledge of the procedure that was followed once a volunteer collected a contribution?

A I can only speculate that they probably separated it and counted it themselves in some way or another.

Q Were you ever present when instructions were given concerning the collection of contributions?

A No, not that I remember.

Q Did you ever give any instructions concerning the collection of contributions?

A Me, never.

Q After you had done your calculations and left a sheet of paper on the desk, did anyone ever question you about the previous day's work that you had done?

A The day before?

Cole - direct

Q You testified you came in after work, did you work, left it there and then left.

When you came in the next day were you ever questioned concerning the work you had completed the previous day?

A No. I was always pretty accurate.

Q Were cash contributions ever used to purchase money orders?

A Not that I recall.

Q Did you ever purchase any money order with cash contributions?

A Never.

Q Were money orders ever purchased in anticipation of cash contributions?

In other words perhaps there was a fund raiser coming up and money orders were purchased in block, which were then used to represent cash contributions that came in during the fund raising?

A I don't think so.

Q Do you know a gentlemen by the name of Sander Fredman?

A I knew him then, yes.

Q What was Mr. Fredman's duties for CFL?

A As far as I remember he was just a volunteer.

Cole - direct

He occasionally did fund raising.

Q How well would you say that you knew Mr. Fredman during that time?

A Not very well. I didn't like him.

Q Has he ever asked you to cash a check for him?

A Never.

Q Has he ever asked you to purchase a money order for him?

A Not that I recall.

Q Do you know of any instances while you were at CFL where one person was asked to purchase a money order for another person?

A I never knew of anything like that.

Q Did you ever contribute to them while you were there?

A Contribute to CFL?

Q Right.

A I may -- Let's see. I can't remember the exact amounts, but I'll bet I made two or three contributions, yes, two or three contributions.

Q What form were those made?

A If I remember right I was married in November of '79 and if I remember right I contributed some money that I got from our wedding, on several

Cole - direct

different occasions. I had an account at Continental Bank and I think I wrote two or three checks, if I remember right, I went to the bank and withdrew money I think and purchased a money order which was, let's see, \$500 I think.

Q Why on that occasion did you purchase a money order rather than writing a check?

A I don't remember.

Q Did anyone instruct you to purchase a money order?

A No.

Q Are you familiar with an organization called the International Democratic Policy Committee?

A I remember the name, yes.

Q How do you know that name?

A If I remember right Lyndon LaRouch was chairman of that, I think.

Q Were you involved at all with that organization while you were at CFL?

A I mean, I may have picked up literature for them or done some odd jobs for them.

Q Have you ever heard of the national campaign operation center?

A No.

Cole - direct

Q Who in the office was the person in contact with the New York office of Citizens for LaRouche?

A I suppose it would be Jerry Rose, since he was involved in the political side of things.

Q Do you know who he was in contact with in the New York office?

A No.

Q How were the contributions sent to New York?

A Like I said before, I wasn't involved in that side of things.

Q If I was instructed to go to the post office with a package, I would send it out.

Q Did you ever receive receipts that things had been sent out?

In other words, you added up the figures and whatever money there was was sent out.

Did you ever receive anything indicating that that money order had been sent out?

A From what you could see on the receipt there, obviously there was no indication there was money in it.

Q I didn't understand.

A Well, in other words, if I went to the post office with a package and sent it out and got a receipt for that, obviously there would be no indication on

Cole - direct

the receipt of what was in the package.

Q I'm not talking about when you go to the post office.

It sounds like you were doing accounting duties, is that correct?

A I suppose you might call it something like that, yes.

I'd consider it less than accounting, but --

Q Bookkeeping?

A All right.

Q After you had received the, after you had added up the figures and left them on the desk for whoever was going to pick them up, did you ever receive anything back from that person indicating that that particular batch of contributions had been sent to New York?

A No, not that I remember.

MS. LERNER: No further questions.

MR. ABRAMS: I have none.

MR. MORGANROTH: I have a couple.

MR. NOBLE: At this point I think we might have a slight problem. Mr. Cole had a lawyer present here but as to right of cross examination, since you're not his attorney and this is an investigatory

Cole - direct
cross

deposition would object by any cross examination other than by Mr. Abrams.

MR. MORGANROTH: Your objection is noted. It's only a couple of questions and foundation questions. I don't think you will have a problem.

CROSS EXAMINATION

BY MR. MORGANROTH:

Q I just want to know what your birth date is?

A November 8, 1957.

Q So at the time you worked for CFL as a volunteer you were somewhere in the 20, 21 --

MS. LERNER: He testified how old he was.

BY MR. MORGANROTH:

Q (Continuing) Somewhere in the 20, 21?

A 20, 21.

Q When you totaled figures on the calculator, did you sit at the desk itself?

A There was a chair there.

Q Anybody ever come up to your desk at the time you were sitting there, totaling and calculating and maybe put something on the desk? If you recall.

A If I recall people shot rubber bands at me.

Q You were there for the general office duty doing the calculating, is that right?

Cole - cross

A Yes. They saw I was the best at it, yes.

Q The best at using a calculator?

A Yes. I was a whiz, right.

MR. MORGANROTH: Nothing further.

MS. LERNER: I have nothing.

Excuse me. We do have something. I'm handing the witness a witness check for \$35 for his appearance here today.

THE WITNESS: Howdy.

MS. LERNER: In addition there are two more things.

You have the right to have an opportunity to see this deposition and make any changes that you think are necessary after it has been transcribed or you may waive that right.

You may want to talk to your attorney.

You may want to talk to your attorney about the fact there are certain confidentiality provisions to the Federal Election Campaign Act concerning testimony at depositions such as these.

MR. NOBLE: Also for the court reporter's purposes that the court reporter should treat this deposition as if it was under seal in a corporate seal.

THE WITNESS: I can get a copy of this?

Cole - cross

MS. LERNER: Talk to your attorney.

MR. NOBLE: Off the record.

(There was a brief interruption,
after which the following further
proceedings were had herein:)

MS. LERNER: Counsel for the witness has
indicated the witness would like an opportunity to review
the transcript and sign.

(Witness excused.)

001236103

FEDERAL ELECTIONS COMMISSION

WASHINGTON, D.C.

IN THE MATTER OF: MUR 1352

I have read the foregoing transcript of my deposition consisting of pages 1 to 28, inclusive and the same is a true, correct and complete transcript of my said deposition as it now appears, so given at the time and place aforesaid.

ROBERT J. COLE

Signed and sworn to
before me this ____ day
of _____, A.D. 1982.

Notary PublicMy commission expires

FEDERAL ELECTIONS COMMISSION

WASHINGTON, D.C.

IN THE MATTER OF: MUR 1352

C C 1 7 3 7 1 0 0

I, David O'Donnell, a duly commissioned, qualified and acting Notary Public within and for the County of Cook and State of Illinois, do hereby certify that prior to the commencement of his deposition the witness, Robert J. Cole, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid;

That the deposition of the said Robert J. Cole was taken before me at 219 South Dearborn Street, Suite 2610, on June 10, 1982, commencing at 11:30 a.m.

That the testimony contained in the said deposition then and there given by the said witness was taken down by me in shorthand in the presence of the said witness and thereafter by me and under my direct personal supervision transcribed into typewriting.

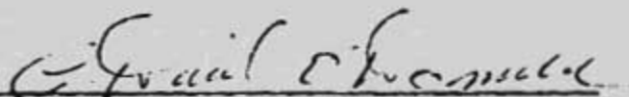
I FURTHER CERTIFY that I am a Certified Shorthand Reporter of the State of Illinois, and that the foregoing transcript of the said deposition is a true, correct and complete transcript of the said shorthand notes so made as aforesaid, and is a true,

correct and complete report of the whole of the testimony so given by said witness as aforesaid, together with such other matters and things as counsel for the parties present at the taking of the said deposition desired to have appear of record.

I FURTHER CERTIFY that after the said deposition was transcribed into typewriting, it was submitted to the said witness, who did thereupon read, sign and again subscribe and make oath to the same, as more fully hereinbefore set forth.

I FURTHER CERTIFY that I am not of counsel for, or attorney, or solicitor for any or either of the said parties, nor am I interested in any manner in the said cause or in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Chicago, Cook County, Illinois, on this 29th day of June, A.D. 1982.


Notary Public
State of Illinois

My commission expires: 8-10-1985



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1982

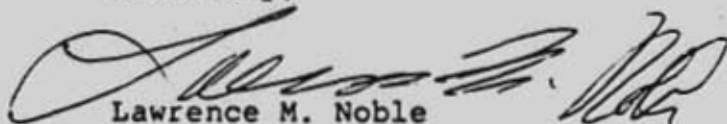
Gary Abrams, Esquire
135 S. LaSalle Street
Suite 2610
Chicago, Illinois 60603

Re: MUR 1352

Dear Gary:

As per our conversation, please find enclosed a copy of the Robert Cole MUR deposition transcript.

Sincerely,



Lawrence M. Noble
Assistant General Counsel

Enclosure

83040371008

LAURA M. BRENNAN

OFFICIAL COURT REPORTER
U. S. DISTRICT COURT
UNITED STATES COURT HOUSE

ROOM 1918

CHICAGO, ILLINOIS 60604
312-427-4393

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

Attn: Ms. Lois G. Lerner

FEDERAL ELECTIONS COMMISSION
WASHINGTON, D. C.

IN THE MATTER OF:

CONTRIBUTIONS TO LYNDON LaROUCHE

DEPOSITION OF GERALD ROSE, taken by
the Federal Elections Commission, pursuant to subpoena,
before C. David O'Donnell, being a disinterested person,
not of Counsel for, or employed by any or either of the
parties hereto, or interested in the outcome of said
cause, a duly Certified Shorthand Reporter and Notary
Public of the State of Illinois, at 219 South Dearborn
Street, Chicago, Illinois, on Monday, May 3, 1982, at
the hour of 10:00 a.m.

PRESENT:

MS. LOIS G. LERNER
MR. LAWRENCE M. NOBLE
1325 K Street NW
Washington, D.C. 20463

appeared for the Federal Elections Commission;

PRESENT: (Continued)

MR. MAYER MORGANROTH
Heritage Plaza, Suite 314B
24901 Northwestern Highway
Southfield, Michigan 48075

appeared for the respondent.

ALSO PRESENT:

Ms. Barbara Boyd

137498711

I N D E X
W I T N E S S

	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>
Gerald Rose	3	28	28

E X H I B I T S

No exhibits were identified.

100371011

MS. LERNER: I would like to ask for the record in what capacity Ms. Boyd --

MR. MORGANROTH: Ms. Boyd is here to aid and assist me.

(Witness duly sworn.)

GERALD ROSE,

called as a witness by the Federal Elections Commission herein, having been by me, the said C. David O'Donnell a Notary Public aforesaid first duly sworn, was examined upon oral interrogatories and he did thereupon depose and testify as follows:

DIRECT EXAMINATION

BY MS. LERNER:

Q Would you please state your full name for the record?

A Gerald Mark Rose.

Q Would you state your address, please?

A 127 West Belle Plaine.

Q Is that in Chicago?

A Chicago, Illinois 60641.

Q How long have you resided there?

A Oh, let's see. In that particular place I think 40 years, or this is the beginning of the 40th year.

Q Are you presently employed?

A Yes. Self-employed.

Rose - direct

Q Are you represented by counsel here today?

A Oh, yes.

Q And who is your counsel, for the record?

A Mayer Morganroth.

Q Are you here pursuant to a subpoena that was issued by the Federal Elections Commission?

A Yes.

MR. MORGANROTH: Which he has voluntarily appeared. The subpoena is not in force and effect because it was for a specific day and date which is long past.

MS. LERNER: I'd like to note for the record that the original date on the subpoena was changed after a request by attorney for Mr. Rose and a notification was, excuse me, then because of litigation that intervened the second date was not used either and the notice was sent to Mr. Rose notifying him of this present date.

MR. MORGANROTH: Whatever the event, the law is a subpoena is invalid unless it is returned on the day and date. It is no longer in force and effect and he is here voluntarily. All I am doing is correcting the record.

MS. LERNER: I don't want to get into a debate either. Our regulations --

MR. MORGANROTH: Your regulations do not establish court procedure. I know the law, as far as contempt

Rose - direct

to subpoenas and your regulations don't establish it.

MS. LERNER: This is an enforcement action --

MR. MORGANROTH: I understand what it is. The subpoena still has to be enforced by the courts.

MS. LERNER: Well, pursuant to that subpoena and to your presence here today, I note for the record that I'm handing Mr. Rose a witness check for \$35 for his appearance here today.

BY MS. LERNER:

Q Mr. Rose, are you aware why you have been called here today?

MR. MORGANROTH: Objection. Speculative. It calls for a conclusion.

If you have a reason for calling him, tell him the reason is. Why should he speculate why he is being called?

MS. LERNER: I did not ask him for the reason. I asked him whether or not --

MR. MORGANROTH: The question calls for a conclusion.

He can't be aware, unless you specifically told him or you put it in your subpoena. You're asking him to speculate. Ask the questions.

MR. NOBLE: That is not necessarily true.

Rose - direct

MR. MORGANROTH: It's true. I instruct him not to answer.

MR. NOBLE: If I can explain something. He also may know why he's here, maybe somebody, something somebody else told him.

MR. MORGANROTH: I instruct him not to answer. That would be hearsay again. He can't read your minds, why you have subpoenaed him.

BY MS. LERNER:

Q You did receive a subpoena from us?

A Yes.

Q I have just handed Mr. Morganroth a copy of a subpoena that was issued to Mr. Rose.

Also like Mr. Rose to look at that.

A All right.

Q Did you note, Mr. Rose, that the subpoena says that you have been called here --

MR. MORGANROTH: Objection. The subpoena speaks for itself.

MS. LERNER: Mr. Morganroth, the subpoena is not an exhibit to the deposition.

MR. MORGANROTH: It's never an exhibit to the deposition and besides it's dated for appearance in April, 1981.

Rose - direct

BY MS. LERNER:

Q I will inform you, Mr. Rose, that you have been called here today by the Federal Elections Commission to discuss possible violation of the Federal Election Laws; specifically in connection with the Citizens For LaRouche Committee.

Have you discussed these possible violations with anyone before coming --

MR. MORGANROTH: Objection. It assumes there is a possible violation.

MS. LERNER: Possible is a word that does not assume anything.

MR. MORGANROTH: I object and instruct him not to answer that.

Ask him if he has discussed anything about this appearance today without couching it in language that gives any inference. It's proper to ask a witness if he discussed his testimony or discussed his appearance today, but not to couch it in language "possible violations".

MS. LERNER: Are you instructing the witness not to answer the question?

MR. MORGANROTH: I'm instructing him not to answer unless you ask it in a perfectly proper and permissible evidentiary form.

Rose - direct

BY MS. LERNER:

Q Mr. Rose, are you aware there is an investigation concerning the Citizens For LaRouche --

MR. MORGANROTH: Objection. Hearsay again.

MS. LERNER: I just informed the witness there was an investigation.

MR. MORGANROTH: Then you say. Now you know.

MS. LERNER: I asked him if he is now aware that there is an investigation concerning Citizens For LaRouche. That is the question.

MR. MORGANROTH: Now what you're asking him: Are you aware the Commission you're representing is investigating Citizens of LaRouche. Is that your question?

MS. LERNER: Yes.

MR. MORGANROTH: Specifically you can answer that question.

BY THE WITNESS:

A Yes.

BY MS. LERNER:

Q Have you discussed this investigation with anyone prior to today?

A No.

Q Have you discussed it with your attorney?

A No. Well, I mean we didn't discuss the investi-

Rose - direct

gation. Yes, he asked me yesterday if I had any problems. I said no. That was it.

Q I'm not sure I understand what you mean "problems"?

A You know, about the investigation. Is there any problems, and I said, of me, speaking here today, and I said no, none at all.

Q Mr. Rose, are you familiar with Lyndon LaRouche?

A Oh, very much so.

Q When did you first become familiar with Lyndon LaRouche?

A About 11 years ago.

Q How was that?

A I was a student at a university and I met him there.

Q Are you familiar with an organization called Citizens For LaRouche?

A Yes.

Q How did you become familiar with that organization?

A Well, I have known Lyndon LaRouche for 11 years and when he decided to run for President I was one of the people who decided to help him.

Q When was that?

A When he decided to run for President, in 1980 --

Rose - direct

I guess he decided in 1979 and that is when I started helping him.

Q What do you mean by helping him?

A Well, I am the political or I was the political director of the Citizens For LaRouche.

Q Where?

A In Chicago.

Q How long did you hold that position?

A Oh, about nine -- about two years. That is a rough estimate.

Q And, I'm sorry, what was the title again?

A The political director.

Q Political director. As a political director, what were your duties?

A Well, my specific duties were to make sure that the people who went out and talked about Lyndon to other people were clear on what our policies were, what our, what our goals were. You know, just very, very clearly briefed everyday on what our new policy thrusts were, what Lyndon was doing. I briefed people, basically.

Q Did you work out of an office?

A Yes.

Q Where was that office located?

A Well, let's see. It was located in, well you

Rose - direct

see there is two phases of the campaign.

In the initial phase of the campaign it was located in the Litton Building, but I don't remember exactly, I think it was on the 14th or 16th floor. I don't remember the address. It is the Litton building.

Then at the later phases of the campaign, which was the two weeks of intensive primary, which Lyndon ran in Illinois in the intensive period, which was after New Hampshire -- New Hampshire, then Illinois and Wisconsin, which is the way we ran it. In that period we were located in other offices. I think they are on Wabash.

Q So approximately how long were you in the Wabash office?

A About a month, at most.

Q That was towards the end of the campaign?

A It was toward the primary period, which is in the March period. I think it was March or whatever but I just don't really remember. I know when the primary was and I think we went in a week before, through the primary.

Q As the political director, were you involved with fund raising at all?

A Not directly in terms of I personally didn't go fund-raise, but I did instruct other people on our policy so that they could fund-raise.

Rose - direct

Q Where did you receive your instructions from?

A Well mainly written communique or written, not communique but policy --

MR. MORGANROTH: We're not clear on whether the direction that he was given was political direction to tell the fund-raisers or whether it was fund-raising direction.

BY MS. LERNER:

Q Concerning the fund-raising, where did you receive your directions from?

A You mean the fund-raising -- I gave people a policy, in other words the way to, way we raised funds is we really organized people. We give them a sense of the policy and they give money. I didn't give specifically how to raise money -- all the details on how to get it and that kind of thing.

Q The policy that you gave, where did you receive your information from?

A Well, Lyn writes a lot. I don't know if you have ever read any of his writings but he writes a lot, wrote a number of books. We receive everyday a thing called a briefing. This briefing gives us a sense of what we are doing.

Q Where did you receive the briefing from?

A We have a telex system.

Rose - direct

Q Where did the telex message come from?

A The telex message usually came from headquarters, wherever, if Lyn was in New Hampshire it would be communicated to New York and then -- what Lyn had to say would be communicated to New York and then to Chicago office through a telex system.

Q Did you deal with anyone in the New York office concerning fund-raising, for example if you had a questioning concerning your fund-raising policy or the fund-raising policy, was there any one specific you would deal with in New York?

A Not me personally. I was, as I said, I was the political director. I really didn't get into the details of the fund-raising. It's very complicated, the political side of the thing. So I just really just was not -- I couldn't get involved in that aspect of the thing just because of the complications of leading the political fight, which was what my role was.

Q Who in the office was the person in charge, in the Chicago office, who was the person in charge of fund-raising in the Chicago office?

MR. MORGANROTH: If you know.

BY THE WITNESS:

A Well, there was a couple of people.

Rose - direct

Let's see. Well, there was a guy by the name of Elliott Eisenberg and there was I think that's -- he had some assistants, but I don't know who they were. There was a couple of people -- it was a big logistic job so he had a couple people.

Q Approximately how many people were in the Chicago office, working out of the Chicago office?

A Oh, there would be about 10 full-time staff. I mean volunteers, but more or less full time. They didn't punch in and out.

Q How many of those people were working on fund-raising?

MR. MORGANROTH: If you know.

BY THE WITNESS:

A Well, gee --

MR. MORGANROTH: Let me state to you that you should not guess. If you know --

BY THE WITNESS:

A I actually don't know exactly how many. I could guess but --

BY MS. LERNER:

Q Can you give an approximation?

A Well now these are the full-time -- we had a lot of part-time people --

Rose - direct

Q I'm talking about the full-time people?

A I'd say there would be about six or so. That is approximate, very rough approximation. I know I had an assistant or two and there was the other section of the office had this fund-raising thing.

Q Was Mr. Eisenberg in charge of the fund-raising?

MR. MORGANROTH: Objection. Been asked and answered.

MS. LERNER: I don't believe that question has been asked and answered.

MR. MORGANROTH: I believe he said Mr. Eisenberg was one of the people, there were several others and he doesn't know exactly.

BY THE WITNESS:

A I really don't know if he was in charge specifically of the fund-raising.

BY MS. LERNER:

Q Who were other people who worked on the fund-raising?

MR. MORGANROTH: Are you talking about full or part-time; field or inside?

BY THE WITNESS:

A See, I'm talking about -- we had two -- we had two sets of operations.

Rose - direct

We had people who volunteered, right, who went out and met people and that was really totally part-time. If you're asking that I have no idea.

BY MS. LERNER:

Q I'm talking about the 10 or so people you mentioned worked in the office.

Who were other people besides Mr. Eisenberg that were involved with the fund-raising effort?

MR. MORGANROTH: If you have personal knowledge only.

BY THE WITNESS:

A I know for instance Mitch Hirsch and, let's see, Elliott had an assistant by the name of Bob Cole. But that is in terms of exactly who, that I know, the other stuff I'd be speculating. They'd sometimes help me and sometimes help him.

BY MS. LERNER:

Q How large was the Chicago office, in space? Was it a whole floor, one room --

MR. MORGANROTH: Which one?

BY MS. LERNER:

Q The second Chicago office.

A I'd say -- see what happened and let me explain because if I would say we had 3,000 feet it would

Rose - direct

sound like a lot but, see, what happens is you have a campaign committee, see, in the primary period. A lot of people just pour in, right. To run around and do that and that was part of the LaRouche's staff from New Hampshire, so we had to greatly expand. That is why we couldn't stay at the Litton Building office.

Q How large was the Litton Building office?

A I can't give you an exact count. I'd say about 1500 square feet or so.

Q And there were 10 people working there full-time?

A Yes.

Q And you don't know who any of the other 10 were that were working on the fund-raising other than the two you have mentioned?

A You said the fund-raising, specific. As I said, there was a lot of back and forth. This thing was, you know, in terms of people who were full-time fund-raisers, right, I think that is what I assume you are talking about.

Q Right.

A People who were full-time fund-raisers, I only know three of them and there were a couple other people but they shifted their responsibility. Often I'd need them or they'd need them.

Rose - direct

Q Do you know a gentleman named David Hoffman?

A Yes, I do.

Q What was Mr. Hoffman's position in that office?

MR. MORGANROTH: If you know.

BY THE WITNESS:

A Let's see. Dave was sort of a swing man. Do some political work for me and do some fund-raising. He was a swing man.

BY MS. LERNER:

Q Did you have someone that you would report to either in the office in Chicago or in New York concerning your duties as the political director?

A Well, everyday I wrote up a report which was sent to New York on the political activities.

Q Who would that report be addressed to?

A It would be addressed to the national executive committee.

Q To any particular person?

A No. The whole committee -- I don't know who read the report. All I know is I would write up the report, TWIX it and whoever got it, got it. It was addressed to the national executive committee.

Q Did you ever have any dealings with the solicitation of contributions, with that aspect of the office?

Rose - direct

A No. That was definitely not my responsibility.

Q Do you know anything about the way that the contributions were kept once they were received in the office?

A No. See, I, as I said, I was extremely busy and that part of the office I didn't want anything to do with it because that was a whole other section of the operation which really would have totally taken away from my capability to do what I had to do or I assumed that anyway.

Q Do you have any knowledge of the procedures that were used in the fund-raising area?

A No.

Q Did any of the volunteers or full-time people ever give you any contributions they had collected?

A No, no. That never went to me, that never went to me.

Q Who would that go to, if you know?

A Well, it would be put on a desk in that office. Whoever was there. I don't know how Elliott exactly had it organized.

Q Could you explain a little more about this desk? Was it a specific desk all the time or --

A I just don't know. I really don't want to speculate.

Rose - direct

Q You mentioned it was put on a desk in the office.

MR. MORGANROTH: It couldn't be the same desk everytime, two different locations.

THE WITNESS: Yes.

BY MS. LERNER:

Q Considering it was in one location, was it always the same desk?

A I don't want to speculate.

Q How do you know the money was put on a desk in the office?

A Well, basically I have walked into the office -- it wasn't like they hermetically sealed it. I mean I'd walk in periodically and see money on the desk.

Q How do you know that was contributions --

A I'm sorry, I shouldn't have said that. I just assumed that.

Q Have you ever seen money orders that were made out to Citizens For LaRouche on that desk?

A As I said, I would walk by -- I assumed -- and as I said, I'm sorry I assumed that. I should have said nothing because I just don't know. I'd walk in there and see things and walk out. I mean we were part of the same, you know, thrust. I just assumed that, I'm sorry.

Q Did, in either of those offices, did you share

Rose - direct

office space with any other organizations?

A Not in the CFL office. Not in the campaign primary period, absolutely not.

Q How about in the Litton office?

A In the Litton office. Yes, we shared some space. It was too much for us. We shared some space, yes.

Q What other people were in that office that you shared with and I don't mean the specific people but was there an organization, were there organizations?

A Well there was a distributing company which got out literature, all sorts of literature.

Q Was that distributing company, did it have any relationship to Citizens For LaRouche?

A Oh, no, absolutely not.

Q Have you ever heard of an organization called the National Anti-Drug Coalition?

A I have heard of it, sure.

Q Did they ever share offices with Citizens For LaRouche at either of the locations?

A No, no.

Q Did they ever work out of the same space at either of the locations?

A No, no.

Rose - direct

Q While you were working as a political director, did you ever receive any information concerning matching funds, presidential matching funds?

A I have heard of it of course.

Q Did you ever receive any information concerning what types of funds were matchable?

MR. MORGANROTH: From who or what, what amount?

THE WITNESS: Anything specific?

MS. LERNER: Let's start with the first question and then get in --

MR. MORGANROTH: You're first propounding the first situation on some sort of hearsay and nothing specific at all.

MS. LERNER: He could say no and then the matter will be closed.

MR. MORGANROTH: He just got through saying he heard of such a thing.

THE WITNESS: Of course I heard of it.

MR. MORGANROTH: Now you can ask him specific questions.

MS. LERNER: I was intending to.

BY MS. LERNER:

Q Did you ever get any information from the main office in New York concerning what types of funds were

Rose - direct

matchable?

A Well let me ask -- not ask, just say I knew what type of funds were matchable. That was not my job but I did know it.

Q How did you know that?

A I think we generally, let's see, in 1976, you know, I was involved in LaRouche's effort and I learned about it there and also I can't remember if there was a specific written legal memo on the thing which I might have read but I think there might have been. I just assumed there would have been, that I read about it. That is how I would know about matching funds.

Q What was your understanding concerning what types of funds were matchable?

MR. MORGANROTH: I'll let him answer, but I object. It's not at all relevant. He never raised funds and had nothing to do with funds. If you just want to get an irrelevant question as to what his understanding is despite the fact he wasn't involved go ahead and answer.

BY THE WITNESS:

A As I understand you can give a total of \$1,000, as I understand it, and that 250 of that \$1,000 is tax deductible. That is as far as I understand it.

Rose - direct

BY MS. LERNER:

Q And where did you get that understanding from?

A As I said, in 1976 I was involved with LaRouche's political effort and in 1980 and as I said I assume, maybe I shouldn't go on the limb but I assumed there was something written and you're talking about two and a half years ago so a lot of this is sort of impressionistic but I assume there was a legal memo about this and I tend to read a lot that comes across my desk.

Q As the policy person in the office, was it your job to direct the fund-raising people concerning such policies as matching funds or --

A No, oh, no.

Q How about fund-raisers, for example?

MR. MORGANROTH: No. He's answered the question four times today, has nothing to do with fund-raisers. He's answered the question so many times and in so many ways that I object to the question being asked over and over just to make a big record.

BY MS. LERNER:

Q While you were in your capacity working for LaRouche, did anyone from the fund-raisers' side or anyone in the office ever ask you to purchase a money order for them?

Rose - direct

A It's so long ago, I mean, I, it's just so long ago, I mean, so much going on that I just don't remember.

Q Approximately how many money orders have you purchased in the last five years?

A Oh, I couldn't tell you that, I don't remember.

Q Did you purchase money orders often?

A I just don't remember. If I need to I sometimes do. If certain times cash has to be liquid on the other side, don't have 10 days, I'll purchase a money order.

Q Is that a usual occurrence for you?

A Sometimes. It depends on what we have to do. If the person really needs the cash at that point I will purchase a money order. If they don't need the cash at that point I'll write a check or I'll give cash.

Q I'm not sure I understand what you're talking about.

A A check, if I write a personal check to somebody it takes 10 days to clear in the bank. If I write a money order, the day it hits the bank it is liquid and it depends upon the, you know, what the person needs it on the other end. If they have 10 days sometimes I write them a check and if they don't have 10 days, sometimes I'll write a money order. It's just a question of liquidity.

Q Would you recall if you had purchased a money

Rose - direct

order for someone at Citizens For LaRouche?

MR. MORGANROTH: That is speculative. If you have a money order, show it to him. He told you he doesn't recall. You have asked him that question once and now you're asking to speculate would you remember. That is double remembrance. If you have them, show them to him.

MS. LERNER: Are you directing him not to answer?

MR. MORGANROTH: Yes, after he answered the question twice, two different ways.

BY MS. LERNER:

Q During the last four years, have you ever purchased a money order for someone else?

MR. MORGANROTH: He already answered that. Said he doesn't remember.

BY THE WITNESS:

A Yes.

MR. LERNER: That is not the question he was asked.

It is the witness' job to testify

MR. MORGANROTH: I understand it is your job to ask questions. You asked him the question one time: Has he purchased money orders in the last several years. Another one is have you purchased money orders for anybody

connected with the LaRouche organization. Another would you remember if you purchased any money orders and what was your policy the last several years.

MS. LERNER: I believe the record will speak for itself and none of those three questions is the question I asked. I asked the witness if in the last four years he purchased money orders for anyone.

MR. MORGANROTH: Your next question can be four years and one month, just to change the question. It is identically the same question. You may answer this one but it will be the last answer on this subject.

BY THE WITNESS:

A As I said, I might have. I don't remember.

MS. LERNER: At this point I would like to take about a five-minute break here and come back and conclude the deposition.

(There was a short recess taken, after which the taking of the deposition was resumed as follow:)

MS. LERNER: At this time I'm not going to ask anymore questions.

I just want to inform the witness that he has a right to read and sign the deposition and I wish to know whether he wishes to exercise that right or waive it.

MR. MORGANROTH: I think he will want to read

Rose -

the deposition.

I want to ask a couple of questions in clarification.

CROSS-EXAMINATION

BY MR. MORGANROTH:

Q Mr. Rose, you testified about 10 full-time people working in the office. Including full time and part-time and field, how many people were going in and out of the office working during the primary period?

A We had 150 or more. Totally, just --

Q Prior to that, during the time you were not in primary period, how many people would be going in and out of the office, working?

A You'd have 30, 40 people sometimes come in and out. People helping out, passing out brochures, doing other things.

MR. MORGANROTH: I have nothing else.

MS. LERNER: One last question.

REDIRECT EXAMINATION

BY MS. LERNER:

Q Do you know a woman named Janice Hart?

A Oh, sure, I know Janice.

Q Did Janice Hart work for you?

A Part-time, sure. She helped on the LeRouche

Rose - redirect

effort, certainly.

Q Was she one of the full-time people?

A No.

Q Was she one of the 10 people --

A No, no.

Q Do you know if she worked on the fund-raising effort?

A I assume she did. I assume she did. People would come in, I'd brief them and they'd go out. I assume she worked on the fund-raising. I don't know if she was passing out brochures or doing both, maybe raising some money, I just don't know.

Q Mr. Rose, were you paid for your services while you were there?

A Not really. I happen to be fortunate in my finances.

Q Did you receive any money from them for your services?

A No.

MS. LERNER: That will complete the deposition.

For the record this matter is to be considered confidential as if it were under seal.

MR. MORGANROTH: Copy of the deposition to be transmitted to my office.

FURTHER DEPONENT SAITH NOT:

I have read the foregoing transcript of my deposition consisting of pages 1 to 29, inclusive, and the same is a true, correct and complete transcript of my said deposition as it now appears, so given at the time and place aforesaid.

(Witness)

Signed and sworn to before me
this _____ day of _____,
A. D., 1982.

Notary Public

My commission expires

33740671039

FEDERAL ELECTIONS COMMISSION
WASHINGTON, D. C.

IN THE MATTER OF:

CONTRIBUTIONS TO LYNDON LaROUCHE

CERTIFICATE OF NOTARY PUBLIC
AND SHORTHAND REPORTER

93710371140
I, C. David O'Donnell, a duly commissioned,
qualified and acting Notary Public within and for the
County of Cook and State of Illinois, do hereby certify
that prior to the commencement of his deposition the
witness GERALD ROSE was by me first duly cautioned and
sworn to testify the truth, the whole truth and nothing
but the truth in the cause aforesaid;

That the deposition of the said GERALD ROSE
was taken before me at 219 South Dearborn Street, Chicago,
Illinois 60604, on Monday, May 3, 1982, commencing at
10:00 a.m., and was concluded on the same day at 12:30; and

That the testimony contained in the said
deposition then and there given by the said witness was
taken down by me in shorthand in the presence of the said
witness and thereafter by me and under my direct personal
supervision transcribed into typewriting.

I FURTHER CERTIFY that I am a Certified
Shorthand Reporter of the State of Illinois, and that the

foregoing transcript of the said deposition is a true, correct and complete transcript of the said shorthand notes so made as aforesaid, and is a true, correct and complete report of the whole of the testimony so given by said witness as aforesaid, together with such other matters and things as counsel for the parties present at the taking of the said deposition desired to have appear of record.

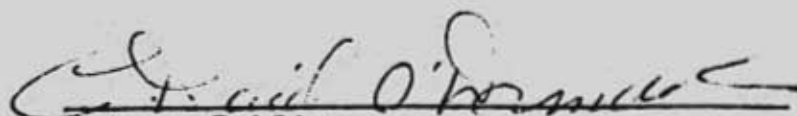
I FURTHER CERTIFY that the Federal Elections Commission was represented at the taking of the said deposition by Ms. Lois G. Lerner and Mr. Lawrence M. Noble; and that Mr. Mayer Morganroth appeared for the respondent and there was also present Ms. Barbara Boyd.

I FURTHER CERTIFY that after the said deposition was transcribed into typewriting, it was submitted to the said witness, who did thereupon read, sign and again subscribe and make oath to the same, as more fully hereinbefore set forth.

I FURTHER CERTIFY that I am not of counsel for, or attorney, or solicitor for any or either of the said parties, nor am I interested in any manner in the said cause or in its outcome.

I FURTHER CERTIFY that after binding, taping, sealing and certifying to the said deposition as more fully hereinbefore appears, I have sealed up the said deposition and mailed it by U. S. Mail, postage prepaid to the Federal Elections Commission, Washington D. C.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my seal of office at Chicago, Cook County,
Illinois, this 1st day of June. A. D. 1982.


Notary Public
State of Illinois

My commission expires

August 10, 1985.

13010671040

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,

Petitioner

v.

COMMITTEE TO ELECT LYNDON LA ROUCHE,
UNITED STATES LABOR PARTY,
NATIONAL CAUCUS OF LABOR COMMITTEES,
NEW SOLIDARITY INTERNATIONAL PRESS
SERVICE, INC., AND
CAMPAIGNER PUBLICATIONS, INC.

Respondents

CIVIL ACTION NO. _____

ORDER TO SHOW CAUSE

The Federal Election Commission has filed an application for an Order requiring respondents, Committee to Elect Lyndon LaRouche by and through their agents including but not limited to Lyndon LaRouche, Lawrence Hecht, Marcia Mary Pepper, and Richard Welsh; United States Labor Party by and through their agents including but not limited to Richard Welsh and Lyndon LaRouche; National Caucus of Labor Committees by and through their agents including but not limited to Ellen Berg, Marjorie Mazel, and Nancy Spannas; Campaigner Publications, Inc., by and through their agents including but not limited to Stephen Pepper, Ed Spannas, and Nancy Spannas, to Show Cause why the subpoenas requiring respondents to answer certain questions and produce evidence should not be enforced. The subpoenas were served on the respondents on June 26 and June 26, 1977, pursuant to the Commission's authority under 2 U.S.C. 437d(a)(3). The respondents did not comply with the subpoenas and the Commission, therefore, on good cause, applied hereto.

IT IS HEREBY ORDERED:

That respondents appear before the Honorable _____

with the records

specified in said subpoenas on the _____ day of _____.

Counsel may be heard and show cause why this court should not

issue an Order directing the respondents to comply with the Commission's subpoenas.

FURTHER ORDERED that this Order shall be served upon respondents by the United States Marshal.

ORDERED this _____ day of _____, 1977.

UNITED STATES DISTRICT JUDGE

● 3 7 4 0 3 7 1 1 ● 5
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,

Petitioner

v.

COMMITTEE TO ELECT LYNDON LA ROUCHE,
UNITED STATES LABOR PARTY,
NATIONAL CAUCUS OF LABOR COMMITTEES,
NEW SOLIDARITY INTERNATIONAL PRESS
SERVICE, INC., AND
CAMPAIGNER PUBLICATIONS, INC.

Respondents

CIVIL ACTION NO. _____

PETITION TO ENFORCE SUBPOENA OF THE
FEDERAL ELECTION COMMISSION

1. This is an action for enforcement of a subpoena, issued pursuant to 2 U.S.C. §437d(a) (3).

2. Jurisdiction is conferred upon this court by 2 U.S.C. §437d(b).

3. Petitioner is the agency of the Federal Government charged with the administration and enforcement of the Federal Election Campaign Act of 1971, as amended (P.L. 94-283). The Federal Election Commission is mandated to investigate possible violations of election laws (2 U.S.C. §431 through 2 U.S.C. §455) and to verify and certify eligibility to receive Presidential Election Campaign Funds (26 U.S.C. §9001 through 26 U.S.C. §9012) and Presidential Primary Matching Payments (26 U.S.C. §9031 through 26 U.S.C. §9042).

4. Respondents are corporations and unincorporated associations having headquarters in the state of New York and having offices in the city of New York. Both corporations are chartered in New York.

5. Pursuant to 2 U.S.C. §437g(a) (2) and on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities over Chapter 96 of the Internal Revenue Code of 1954 (26 U.S.C. §9031 through 26 U.S.C. §9042), the petitioner on May 12, 1977, found Reason to Believe that violations of the following statutes had been committed by respondents, as set out:

(a) National Caucus of Labor has violated:

- (1) 2 U.S.C. §434 by failing to register and report with the Commission.
- (2) 2 U.S.C. §441a by making excessive contributions in-kind to the Committee to Elect Lyndon LaRouche (hereinafter, CTEL) and the United States Labor Party (hereinafter, USLP).
- (3) 2 U.S.C. §433(b) (2) by not registering as an affiliated committee with USLP and CTEL.

(b) New Solidarity International Press Service, Inc.,
violated:

- (1) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTEL, and the National Caucus of Labor Committees (hereinafter, NCLC), on behalf of the LaRouche Presidential campaign.

(c) Campaigner Publications, Inc., has violated:

- (1) 2 U.S.C. §441b by making illegal corporate contributions in-kind to USLP, CTEL and NCLC on behalf of the LaRouche Presidential campaign.

(d) Committee to Elect Lyndon LaRouche has violated:

- (1) 26 U.S.C. §9042 by making false and misleading statements in reports and certifications and on audit reports.
- (2) 2 U.S.C. §433(b) (2) by failing to report affiliation with USLP and NCLC.

(e) U.S. Labor Party has violated:

- (1) 2 U.S.C. §433(b) (2) by not reporting its affiliation with CTEL and NCLC.

6. Notification of the petitioner's determination was sent to respondents on May 13, 1977.

7. When no response was received from respondents, the petitioner sent follow-up letters to the respondents on June 9, 1977.

8. On June 26, and June 27, 1977, the petitioner served on the respondents subpoenas.

9. Respondents did not petition the Commission for a Motion to Quash or modify the subpoena pursuant to Commission Regulation §111.13(a) (11 CFR 111.13).

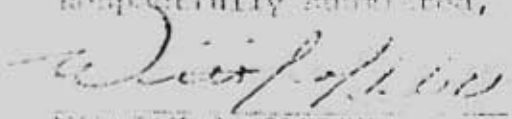
10. Respondents have not complied with the subpoenas of the Commission.

11. No prior applications have been made for the relief sought herein.

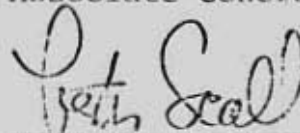
WHEREFORE, the Federal Election Commission prays:

- (1) That an Order to Show Cause issue forthwith directing respondents to appear before this court on August 31, 1977, and to show cause, if there be any, why an Order should not be issued directing the respondents to comply with the subpoenas of the Federal Election Commission.
- (2) That this court issue an order directing the respondents to comply with the subpoenas of the Federal Election Commission.
- (3) The Federal Election Commission be granted such further relief as may be necessary and appropriate.

Respectfully submitted,


EUGENE C. O'BRIEN
General Counsel

CHARLES N. STEELE
Associate General Counsel



LESTER SCALL
Assistant General Counsel



BARBARA VAN GELDER
Attorney

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202-523-4524

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,)	
)	
Petitioner)	
)	
v.)	CIVIL ACTION NO. _____
)	
COMMITTEE TO ELECT LYNDON LA ROUCHE,)	
UNITED STATES LABOR PARTY,)	
NATIONAL CAUCUS OF LABOR COMMITTEES,)	
NEW SOLIDARITY INTERNATIONAL PRESS)	
SERVICE, INC., AND)	
CAMPAIGNER PUBLICATIONS, INC.)	
)	
Respondents)	

BRIEF IN SUPPORT OF PETITION TO ENFORCE SUBPOENA
OF THE FEDERAL ELECTION COMMISSION

STATEMENT OF CASE

This case is before the court on petition to enforce subpoenas of the Federal Election Commission. Jurisdiction of this court is invoked pursuant to 2 U.S.C. §437d(b).

The subpoenas were issued in connection with an enforcement investigation of the above-named parties based upon an analysis of information "ascertained in the normal course of carrying out [the Commission's] supervisory responsibilities" of verifying required reports submitted to the Commission under Title 2 of the United States Code, or matching fund submissions under Chapter 26 of the United States Code. 2 U.S.C. §437g(a)(2).

Our analysis of the reports of Committee to Elect Lyndon LaRouche and the United States Labor Party suggests the need for further investigation of the factual issues arising from the apparent coordination of the respondents' activities with the presidential campaign of Lyndon LaRouche.

On October 14, 1976, Lyndon LaRouche, the presidential candidate of the United States Labor Party, submitted a request for presidential primary matching funds with the Federal Election Commission pursuant to 26 U.S.C. §9033. On October 23, 1976, Mr. LaRouche and his principal campaign committee, the Committee to Elect Lyndon LaRouche, (hereinafter referred to as CTEL) filed suit in this court for an Order directing the Federal

Election Commission (hereinafter referred to as "FEC" or "the Commission") to immediately certify Mr. LaRouche's eligibility to the United States Treasury. In January 1977, the court denied the requested relief and dismissed the action without prejudice. Committee to Elect Lyndon LaRouche, et al., v. Federal Election Commission, U.S.D.C. D.C., Civil Action No. 76-2010.

Even at the time of dismissal of the initial action, the Commission had not received copies of instruments or other written verification of contributions to meet the threshold requirements of the statute. (26 U.S.C. §9033). In expectation that such written documentation would be received, the Commission approved audit and contribution verification procedures.

On the basis of the audit and field investigations conducted by the Commission pursuant to 26 U.S.C. §9038, the Commission determined on February 10, 1977, that CTCL had not reached the matching fund threshold in verifiable contributions. No further audit work on the records of CTCL and the other organizations was performed pursuant to 26 U.S.C. §9038, counsel having advised the FEC that CTCL would not make the records available and that the other organizations had indicated they would not consent.

On February 14, 1977, Lyndon LaRouche, CTCL and LeRoy Jones (a contributor), filed a petition for review of the Commission's denial of matching funds certification in the Court of Appeals. Committee to Elect Lyndon LaRouche, et al., v. Federal Election Commission, U.S.C.A., D.C. Cir., No. 77-1184, pursuant to 26 U.S.C. §9041 which enables that court to review any agency action made under the provisions of Chapter 26. On April 28, 1977, the same plaintiffs filed a damage suit for redress of alleged unconstitutional harassment and actions by agents of the Federal Election Commission in connection with the verification of the matching fund submission. This action

is currently before the court. Jones v. Unknown Agents of the Federal Election Commission, U.S.D.C., D.C., Civil Action No. 77-0732.

On the basis of the information received during the audit and field investigation, the Commission found reason to believe that the Committee to Elect Lyndon LaRouche may have violated the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act"). Letters of notification by certified mail were sent to the five (5) respondents on May 13, 1977. (See Attachment #1.) Respondents were afforded "a reasonable opportunity to demonstrate that no action should be taken against such person(s) by the Commission under this Act." 2 U.S.C. §437g(a)(2) and (4).

When respondents failed to respond, follow-up letters were sent to the respondents on June 9, 1977.^{1/} (See Attachment #2.)

On June 24, 1977, local counsel for respondents filed a Motion for a Temporary Restraining Order in this court in conjunction with Jones v. Unknown Agents of the Federal Election Commission, supra. Respondents' motion included the following request:

Plaintiffs further move that FEC and its agents be prevented from harassing, investigating, or contacting plaintiffs and auditing their books and records.

On June 28, 1977, at oral argument, Judge Robinson denied the Motion for a Temporary Restraining Order.^{2/}

On the same day as the Commission was served with the Motion for a Temporary Restraining Order, the Commission sent out subpoenas to produce documents and compel testimony pursuant to 2 U.S.C. §437d(a)(3). (See Attachment #3.) In

^{1/} The National Caucus of Labor Committees' follow-up letter was returned due to an incorrect address.

^{2/} In spite of this denial, respondents have raised the same issue as their rationale for refusal to comply with the FEC subpoenas. (See Attachment #7, discussed infra.)

deference to the claimed indigency of respondents, the Commission made the subpoenas returnable at the offices of CTCL in New York City, on July 8, 1977, for the production of documents and July 14 and 15, 1977, for the depositions.

Respondents applied to the Commission, through local counsel, for an extension of time in which to comply with the subpoenas in order to accumulate the materials and to retain counsel in New York City. (See Attachment #4.)

On July 7, 1977, the Commission denied the request and immediately notified the respondents by telephone and telegram of the denial, but rescheduled the compliance date for July 11, 1977. (See Attachment #5.)

The Commission then sent three (3) auditors and an attorney to New York City on July 11, 1977, to review the requested documents. At that time, New York counsel, Gregory Perrin, stated that the documents were not available for review at that time, but would be substantially ready for review in ten days' time. Counsel for the petitioner and respondents then stipulated to an extension of time until July 20, 1977. (See Attachment #6.)

On July 19, 1977, Mr. Perrin telephonically notified the Commission that his clients had decided not to comply with the subpoenas or honor the stipulation.

On July 20, 1977, the Commission received formal notification of the respondents' breach of the stipulation. (See Attachment #7.)

ARGUMENT

THE COMMISSION HAS AUTHORITY TO ISSUE THE SUBPOENAS AND THE COURT HAS THE POWER AND JUSTIFICATION TO ENFORCE IT

The Federal Election Commission has broad authority to administer the Federal Election Campaign Act of 1971, as amended. The Commission's powers include the power to formulate general policy with respect to the administration of the

Act (2 U.S.C. §437d(a)(9)), the power to make rules to carry out the provisions of the Act (2 U.S.C. §437d(a)(8), and the power to initiate civil actions to enforce the provisions of the Act (2 U.S.C. §437d(a)(6)). The Commission is given exclusive primary jurisdiction with respect to civil enforcement of the Act. 2 U.S.C. §437e(b)(1), §437d(e), and §437g.

Pursuant to its enforcement process, the Commission has specific statutory authority to conduct investigations to determine if candidates for federal office, among others, are committing violations of the federal election laws. Section 437g of Title 2, United States Code, provides in relevant part:

(a)(2) The Commission upon receiving any complaint under paragraph (1), and if it has reason to believe that any person has committed a violation of this Act or of Chapter 95 or Chapter 96 of the Internal Revenue Code of 1954, or, if the Commission, on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, has reason to believe that such a violation has occurred, shall notify the person involved of such alleged violation and shall make an investigation of such alleged violation in accordance with the provisions of this section. (Emphasis added.)

The Commission, therefore, clearly has the authority to investigate information ascertained during its matching fund verification process which would give the Commission reason to believe the respondents may have violated federal election laws.

To support the Commission's investigatory power,^{3/} the Act authorizes the Commission to issue subpoenas to compel the submission of reports and answers to questions. Section 437d(a) of Title 2, United States Code, states that:

^{3/} The Commission's order power is analogous to that of the Federal Trade Commission under North 15 U.S.C. 445 and 46, and this power has been broadly construed by the courts. See United States v. Morton Salt, 338 U.S. 632 (1950).

The Commission has the power --

(3) to require by subpoena, signed by the chairman or the vice chairman, the attendance and testimony of witnesses and the production of all documentary evidence relating to the execution of its duties.

The Supreme Court has held that orders and subpoenas of administrative agencies may be enforced where the investigation is within the authority of the agency, the order or subpoena is not too indefinite, and the information sought is reasonably relevant. United States v. Morton Salt Co., 338 U.S. 632, 652 (1950). See also, EEOC v. University of New Mexico, Albuquerque, New Mexico, 504 F.2d 1296 (10th Cir. 1976); 1 Davis, Administrative Law Treatise, §§3.04-3.12 (West 1958 and Supp. 1970). Provided that the subpoena describes with sufficient specificity the evidence sought and is not framed in oppressive terms, it is entitled to enforcement, subject only to requirements that the agency is acting within the statutory authority of a general class of proceeding which it is empowered to conduct, that the agency's action is not arbitrary, and that the information sought is not "plainly incompetent or irrelevant to any lawful purpose." Endicott Johnson Corp. v. Perkins, 317 U.S. 501, 503 (1942); SEC v. Vacuum Can Co., 157 F.2d 530 (7th Cir. 1946), cert. denied, 330 U.S. 820 (1947).

The subpoena in the present matter seeks information which is necessary and relevant to the Commission's investigation of the following issues: (1) affiliation between the Committee to Elect Lyndon LaRouche, the United States Labor Party, and National Caucus of Labor Committees; (2) corporate contributions from New Solidarity International Press, Inc., and Campaigner Publications, Inc.; and (3) false statements or material misrepresentations on the matching fund submissions of the Committee to Elect Lyndon LaRouche.

Respondents were notified of the purpose of the investigation several months prior to the issuance of the Commission's subpoena. The notification letters, as already noted, set forth

the statutory provisions on which the Commission investigation is based and the general scope of the investigation, including a summary of the allegation. The information sought pursuant to the subpoena, as already noted, is relevant to determining whether respondents have, in fact, committed violations of the statutory provisions which they have been advised are in issue. Thus, the issuance of the subpoena is a reasonable and appropriate exercise of the Commission's statutory authority. See, Isbrandsten-Moller Co., v. United States, 300 U.S. 139 (1937); Far East Conference v. Federal Maritime Commission, 337 F.2d 146 (D.C. Cir. 1964), cert. denied, 379 U.S. 991 (1965).

In the event of a Commission decision to issue a subpoena, the respondents are allowed five (5) days after the date of service to apply to the Commission to quash or modify the subpoena. (11 C.F.R. 111.13.)

Respondents did petition the Commission for an extension of time in which to comply with the subpoena. (See Attachment #4.) Although the request came within five days of receipt of the subpoenas, the Washington counsel who requested the extension specifically preserved all rights the respondents may have, which newly appointed counsel may wish to exercise. Accordingly, the Commission did not review the request of respondents as a formal motion to quash the subpoenas pursuant to Commission Regulation 111.13, supra.

Since the Commission received no further motions from respondents within five days (or any time) of receipt of the subpoenas, respondents have waived their administrative remedy and this court may now enforce the subpoenas pursuant to 2 U.S.C. §4374(b).

Subpoena enforcement proceedings of the nature before the court are summary in nature. Donaldson v. United States, 392 U.S. 517, 528 (1968). As long as the rights of the parties summoned are protected and an adversary hearing made

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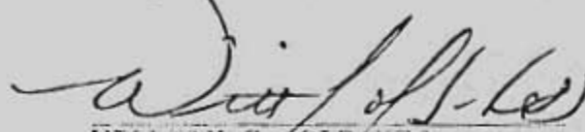
available, if requested, the court need not require the filing of a complaint followed by an answer and discovery under the Federal Rules of Civil Procedure. Donaldson, supra, 400 U.S. at 529; United States v. McCarthy, 514 F.2d 368, 373, 377 (3d Cir. 1975). Therefore, the Commission's proper relief is to petition this court for an Order to Show Cause at a date and time certain why an order enforcing its subpoenas should not be issued.

CONCLUSION

The Commission is proceeding within its congressionally mandated authority in its investigation of the Committee to Elect Lyndon LaRouche, United States Labor Party, National Caucus of Labor Committees, New Solidarity International Press Service, Inc., and Campaigner Publications, Inc. The subpoenas issued by the Commission are clearly authorized and seek, within well established bounds, to compel the production of evidence and testimony in support of the investigation. The court has jurisdiction to enforce the subpoenas and may issue an Order to Show Cause why the subpoenas should not be enforced.

For reasons expressed herein, it is submitted that the Commission's petition to enforce the Federal Election Commission's subpoenas should be granted, and an Order to Show Cause should be issued by the court.

Respectfully submitted,


WILLIAM C. OLDAKER
GENERAL COUNSEL

CHARLES N. STEELE
ASSOCIATE GENERAL COUNSEL


LESTER SCALL
ASSISTANT GENERAL COUNSEL


 BARBARA VAN GELDER
 ATTORNEY

Attorneys for the
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D. C. 20463
 202-523-4524



FEDERAL ELECTION COMMISSION

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

May 13, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Caucus of Labor Committees
Lyndon LaRouche, Chairman
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe the National Caucus of Labor Committees (NCLC) has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. A summary of the provisions at issue and the evidence involved in the violations is as follows:

(1) Reports filed by the Committee to Elect Lyndon LaRouche (CTEL) indicate that during 1976 NCLC made \$6,250 in in-kind contributions to CTEL. In addition NCLC rented office space to CTEL for which, according to CTEL records, there is an outstanding debt in excess of \$35,030.27. Finally, it appears that a number of NCLC members have worked on behalf of the LaRouche Campaign. This evidence appears to indicate that NCLC is a political committee within the meaning of 2 U.S.C. §431(d). Accordingly, the Commission has found reason to believe that NCLC is in violation of the registration and reporting requirements set forth in 2 U.S.C. §§433 and 434.

(2) Our analysis of reports filed by the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche, (CTEL) indicates that each group has accumulated a substantial debt to your committee without any significant repayment. The steady accumulation of these debts may be viewed as contributions-in-kind to USLP and CTEL and as such gives the Commission reason to believe that violations of the limitations contained in 2 U.S.C. 441a(1)(A), have been committed.



(3) The personnel overlap between USLP, NCLC, and CTCL, in addition to common addresses, similar patterns of contributions, possibly interconnected expenditure patterns, and substantial transfers of funds among the groups appears to indicate that USLP, CTCL and NCLC are all affiliated committees. Accordingly, there is reason to believe that the groups are in violation of 2 U.S.C 433(b) (2) for failing to report such affiliation.

Under 2 U.S.C. §437g(a) (4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission, we request that the following materials be made available:

1. All records reflecting an agreement or agreements between NCLC and USLP in force from 1976 to the present for the provision of office space and services in connection therewith.

2. The agreement or agreements between NCLC and any other party of parties from whom it leases office space.

3. Records of all loan agreements made by NCLC with USLP and CTCL involving monies used in connection with a federal election, particularly as reflected in the campaign reports of the latter two groups.

4. Records of all debts owed to NCLC by CTCL and amounts paid by CTCL in connection therewith. Records of deposits of monies received from CTCL in connection with said debts.

5. Records of all debts owed to NCLC by CTCL and amounts paid by CTCL in connection therewith. Records of deposits of monies received from NCLC in connection with said debts.

In addition we would appreciate if you would respond to the following items:

1. USLP set forth a number of entries in schedule A of reports listing your organization as the donor without any description of the services (see attached pages). For each entry please describe: (a) the explicit services underlying the entry; (b) the person or persons involved in these services. Please supply any records which document the information in your answer.

2. CTEL sets forth several entries in its campaign reports bearing the notation "contribution-in-kind" and listing your organization as the donor. (See attached pages). For each entry please describe: (a) the explicit services underlying the contribution-in-kind; (b) person or persons involved in these services. Please supply any records which document the information in your answer.

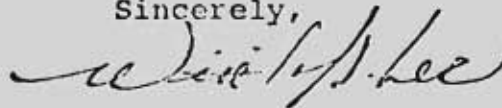
Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of receipt of this letter.

Where possible please submit answers to the preceding two questions under oath by person having personal knowledge of the information alleged. This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public.

If you have any questions, please contact Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

100-171051



FEDERAL ELECTION COMMISSION

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

United States Labor Party
Lyndon LaRouche, Chairman
321 West 29th St.
New York, New York

May 13, 1977

Re: MUR 398 (77)

Dear Mr. LaRouche:

This letter is to notify you that the Commission has found that there is reason to believe that the United States Labor Party has violated 2 U.S.C. §433(b)(2) by not reporting the affiliation with the National Caucus of Labor Committees and the Committee to Elect Lyndon LaRouche.

The personnel overlap among USLP, NCLC and CTCL, in addition to common addresses, similar patterns of contributions, possibly inter-connected expenditure patterns, and substantial transfers of funds among the group appears to indicate that NCLC, CTCL and USLP are all affiliated committees.

In this connection, it also appears to us, from a surface reading of USLP reports, that USLP may have a large number of contributions to the LaRouche 1976 Presidential Campaign which are not specifically delineated as such. These would count against the limitations set forth in 2 U.S.C. §441a.

Under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission the Commission requests that the following materials be made available:

1. Your party set forth a number of entries (see attached copies) in its reports which bear the notation "Creditor of NCLC". For each entry please describe: (a) the explicit purpose for which it was made; (b) the person(s) making the expenditure.



Please supply any records which document the information in your answers.

2. Records of payments to Niles Realty, as well as records of payments to NCLC for rent and utilities.

3. A copy of the rental agreement between USLP and its lessor.

4. Records of expenditures made on behalf of the LaRouche Presidential Campaign, including but not limited to all television shows on which Mr. LaRouche appeared, and all expenditures to Campaigner Publications and New Solidarity International Press Service. This should include copies of invoices between USLP and all vendors which USLP used on behalf of the LaRouche Presidential Campaign.

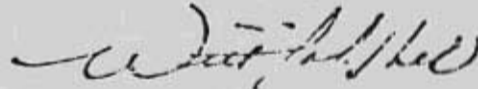
5. Records of all loan agreements with commercial establishments and documentation of the security on which these loans were based.

Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This investigation shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this case is Biz Van Gelder (telephone no. 202/523-4175). For your information, the Commission plans to consolidate its investigations herein with the one being conducted in MUR 368 (you were notified of this investigation under separate cover).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

May 13, 1977

Marjorie Mazel, President
New Solidarity International
Press Service, Inc.
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Ms. Mazel:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe that New Solidarity International Press Service has violated 2 U.S.C. 441b by making illegal contributions in-kind to the United States Labor Party and the Committee to Elect Lyndon LaRouche.

The Commission's decision is based on its analysis of the reports filed during the calendar year by the United States Labor Party and the Committee to Elect Lyndon LaRouche. Our review of these reports has ascertained a heavy accumulation of debt to your corporation by the Committee to Elect Lyndon LaRouche and the United States Labor Party over a substantial period of time without any significant repayment. Accordingly, these debts may be viewed as contributions in-kind until repaid. Since 2 U.S.C. 441b(a) prohibits corporate contributions in any form, and since New Solidarity International Press Service lists itself as a corporation there is reason to believe that New Solidarity International Press Service has violated the Act.

Under 2 U.S.C. §437g(a)(4) you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission the Commission requests that your corporation make the following information available for review.

1. Records of all debts owed by the Committee to Elect Lyndon LaRouche (CTEL) and United States Labor Party (USLP) in connection with the committee expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL; records of all deposits of such payments.



2. All records containing a description of services rendered on behalf of the 1976 presidential campaign of Mr. LaRouche and, wherever possible representative samples of said services.

3. Copies of your corporation's financial statements for fiscal years 1975 and 1976.

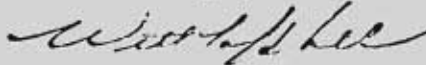
4. Copies of any cash flow statements for your corporation for fiscal years 1975 and 1976.

Under the Act the Commission is required to conduct its investigation expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET NW.
WASHINGTON, D.C. 20463

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P.O. Box 1972
GPO New York, New York 10001

May 13, 1977

Re: MUR 398 (77)

Dear Ms. Pepper:

This letter is to inform you that the Commission has determined it has reason to believe that the Committee to Elect Lyndon LaRouche has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the Act). The provisions at issue and the evidence underlying the violations are listed below. The violations are in addition to those noted in MURS 281, 328, and 368 about which you were notified under separate cover.

1. The Commission has found reason to believe that CTCL has violated 26 U.S.C. §9042(c)(1) by making false and misleading statements in reports for certifications. The basis of the allegation lies in the Commission's continuing investigation of MURS 368, 328 and 281 and on information ascertained in review of all documents submitted by your committee during the calendar year 1976.

2. The personnel overlap between USLP, NCLC, and CTCL, in addition to common addresses, similar patterns of contributions, possibly interconnected expenditure patterns, and substantial transfers of funds among the groups appears to indicate that USLP, CTCL and NCLC are all affiliated committees and therefore are in violation of 2 U.S.C. 433(b)(2) for failing to report such affiliation.

In connection with our investigation into the above referenced violations, and our investigation in conjunction with MURS 281, 328, and 368, the Commission will need to update the review of your records which began last October.





FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

May 13, 1977

Campaigner Publications, Inc.
Edward Spannus, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. Spannus:

This letter is to notify you that the Federal Election Commission has determined that there is reason to believe that Campaigner Publications has violated 2 U.S.C. 441b by making illegal contributions in-kind to the United States Labor Party and the Committee to Elect Lyndon LaRouche.

The Commission's decision is based on its analysis of the reports filed during the calendar year by the United States Labor Party and the Committee to Elect Lyndon LaRouche. Our review of these reports has ascertained a heavy accumulation of debt to Campaigner Publications by the Committee to Elect LaRouche over a substantial period of time without any significant repayment. Accordingly, these debts may be viewed as contributions-in-kind. Since 2 U.S.C. 441b prohibits corporate contributions in any form, and since Campaigner Publications lists itself as a corporation, there is reason to believe that Campaigner Publications has violated the Act.

Under 2 U.S.C. §437g(a)(4), you have a reasonable opportunity to demonstrate that no action should be taken against you. As part of your submission, the Commission requests that your corporation make the following information available for review:

1. Records of all debts owed by the Committee to Elect Lyndon LaRouche (CTEL) to Campaigner Publications in connection with the committee's expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL; records of all deposits of said payments.



2. All records containing a description of services rendered on behalf of the 1976 presidential campaign of Mr. LaRouche and, where possible a sample of said services.

3. Copies of your Corporation's financial statements for fiscal years 1975 and 1976.

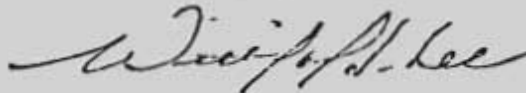
4. Copies of any cash flow statements for your Corporation for fiscal years 1975 and 1976.

Under the Act the Commission is required to conduct its investigations expeditiously. Accordingly, we would appreciate having your response within fifteen (15) days of your receipt of this letter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Biz Van Gelder (telephone no. 202/523-4175).

If you intend to be represented by counsel in this proceeding, please have such counsel notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20541

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Caucus of Labor Committees
Lyndon LaRouche, Chairman
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the National Caucus of Labor Committees (NCLC) has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NCLC concerning the alleged violations. The Commission therefore, requests that NCLC submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



JUN 9 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

United States Labor Party
Lyndon LaRouche, Chairman
321 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Mr. LaRouche:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the United States Labor Party (USLP) has violated 2 U.S.C. 5433(b)(2). The matter has been designated as MUR 398 (77).

To date the Commission has received no response from USLP concerning the alleged violation. The Commission therefore, requests that USLP submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time specified.

Sincerely yours,

William C. Oldaker
General Counsel

SThomas:cfb:6/8/77
cc: MUR 398 (77)



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

June 9, 1977

CERTIFIED MAIL RETURN RECEIPT REQUESTED

New Solidarity International Press Service, Inc.
Marjorie Mazel, President
231 West 29th Street
New York, New York

Re: MUR 398 (77)

Dear Ms. Mazel:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that New Solidarity International Press Service (NSIPS) has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from NSIPS concerning the alleged violation. The Commission therefore requests that NSIPS submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

1. THE FOLLOWING SERVICE IS REQUESTED (check one): <input type="checkbox"/> Show to whom and date delivered..... <input type="checkbox"/> Show to whom, date, & address of delivery..... <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered..... <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.....		2. ARTICLE ADDRESSED TO: Marjorie Mazel, President		3. ARTICLE DESCRIPTION: RETURNED NO. 943339 INSURED NO.		4. DATE OF DELIVERY POSTMARK		5. ADDRESS TO DELIVER BECAUSE: CARRIER'S INITIALS	
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RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, DC 20543

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Committee to Elect Lyndon LaRouche
Marcia Merry Pepper, Chairperson
P. O. Box 1972
New York, New York 10001

Re: MUR 398 (77)

Dear Ms. Pepper:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that the Committee to Elect Lyndon LaRouche has violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The matter, designated as MUR 398 (77), has been consolidated with MURs 281, 328 and 368 of which you were previously notified.

To date the Commission has received no response from the Committee concerning these alleged violations of the Act. The Commission therefore requests that the Committee submit its response to all of these matters within 5 days of receipt of this letter. The Committee is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

June 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCampaigner Publications, Inc.
Edward Spannus, President
231 West 29th Street
New York, New YorkRe: MUR 398 (77)

Dear Mr. Spannus:

On May 13, 1977, the Commission sent a letter notifying you that it had determined there is reason to believe that Campaigner Publications has violated 2 U.S.C. §441b. The matter has been designated as MUR 398 (77).

To date the Commission has received no response from Campaigner Publications concerning the alleged violation. The Commission therefore requests that Campaigner Publications submit its response within 5 days of receipt of this letter. The respondent is urged to avail itself of the opportunity to submit its response voluntarily within the time period specified.

Sincerely yours,

William C. Oldaker
General Counsel

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered..... 15¢ <input type="checkbox"/> Show to whom, date, & address of delivery.. 35¢ <input type="checkbox"/> Return to sender by registered mail..... 65¢ <input type="checkbox"/> Return to sender by registered mail and delivery..... 85¢ 2. ARTICLE ADDRESSED TO: Campaigner Publications, Inc. Edward Spannus 398 (77)		3. INSURED NO. 4. DATE OF DELIVERY, 1977		5. SIGNATURE OF AUTHORIZED AGENT 6. POSTMARK		7. CLERK'S INITIALS	
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UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: Committee to Elect Lyndon LaRouche
P. O. Box 1972
G.P.O. New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the Committee to Elect Lyndon LaRouche (CTEL) is hereby SUBPOENAED to appear at the offices of CTEL, 231 West 29th Street, New York, New York, on July 8, 1977, at 9:00 a.m. and to bring with him or her:

1. Copies of all receipts of CTEL from contributors, fundraising events, or loans from October 16, 1976, to the present.
2. Records of all expenditures made by CTEL from October 18, 1976, to present, with copies of the invoices which reflect the services received for payments made.
3. Copies of all loan agreements with lenders to CTEL. Please include the interest and amount of principal still outstanding.
4. All records and documents dealing with transfers of money by CTEL to the National Caucus of Labor Committees.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Commons
Secretary to the Commission

100-398 100-398

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).

☐ Show to whom and date delivered 15¢

☒ Show to whom, date, & address of delivery 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Comm. to Elect Lyndon
La Rouché
NY, NY

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943463	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized Agent

James Connelley

4. DATE OF DELIVERY

June 21, 1977

5. ADDRESS (Complete only if requested)

1111 1st St
NY, NY

6. OFFICE TO DELIVER TO (If any)

NYC

7. POSTMARK

NYC

8. OTHER COMMENTS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: National Caucus of Labor Committees
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the National Caucus of Labor Committee (NCLC) is hereby SUBPOENAED to appear at the offices of NCLC, 231 West 29th Street, New York, New York, on July 8, 1977, at 10:00 a.m. and to bring with him or her:

1. All records reflecting an agreement or agreements between NCLC and the United States Labor Party (USLP) in force from 1976 to the present for the provision of office space and services in connection therewith.

2. The agreement or agreements between NCLC and any other party or parties from whom it leases office space.

3. Records of all loan agreements made by NCLC with USLP and the Committee to Election LaRouche (CTEL) involving monies used in connection with a federal election, particularly as reflected in the campaign reports of the latter two groups.

4. Records of all debts owed to NCLC by CTEL and amounts paid by CTEL in connection therewith. Records

of deposits of monies received from CTED in connection with said debts.

5. Records of all debts owed to NCLC by USLP and amounts paid by USLP in connection therewith. Records of deposits of monies received from NCLC in connection with said debts.

6. Any records which document a number of entries in schedule A of USLP reports listing NCLC as the donor without any description of the services (see attached pages), including any record which describes: (a) the explicit services underlying the entry, or (b) the person(s) involved in these services.

7. Any records which document several entries in CTED campaign reports bearing the notation "contribution-in-kind" and listing NCLC as the donor (see attached pages), including any record which describes: (a) the explicit services underlying the contribution-in-kind, or (b) the person(s) involved in these services.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTENT:

William L. Brown
Secretary to the Commission

and not contribute to the Committee in full

U.S. Labor Party

Full Name, mailing address and ZIP code National Council of Labor Committees 231 W. 29th Street New York, N.Y. 10001		Date (month, day, year) 02/03/76	Amount of each receipt this period \$200.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Same as above		Date (month, day, year) 09/17/76	Amount of each receipt this period 65.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Same as above		Date (month, day, year) 09/17/76	Amount of each receipt this period 115.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Same as above		Date (month, day, year) 09/20/76	Amount of each receipt this period 550.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Same as above		Date (month, day, year) 09/16/76	Amount of each receipt this period 275.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		
Full Name, mailing address and ZIP code Same as above		Date (month, day, year) 09/16/76	Amount of each receipt this period 125.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$		

Name of Contributor (Print in full)

U.S. Labor Party

Full Name, mailing address and ZIP code

National Caucus of Labor Committees
 231 W. 29th Street
 New York, N.Y. 10001

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/16/76

Amount of cash
 receipt this year

\$200.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/16/76

Amount of cash
 receipt this year

100.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/16/76

Amount of cash
 receipt this year

40.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/13/76

Amount of cash
 receipt this year

575.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/07/76

Amount of cash
 receipt this year

200.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
 day, year)

09/07/76

Amount of cash
 receipt this year

250.00

Signature of contributor (Print name)

Signature of agent (Print name)

Name of Candidate or Committee in full

U.S. Labor Party

Full Name, mailing address and ZIP code

National Council of Labor Committees
231 W. 29th Street
New York, N.Y. 10001

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/07/76

Amount of each
receipt this period

\$200.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/03/76

Amount of each
receipt this period

200.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/24/76

Amount of each
receipt this period

600.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/31/76

Amount of each
receipt this period

175.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/16/76

Amount of each
receipt this period

600.00

Full Name, mailing address and ZIP code

Same as above

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

09/16/76

Amount of each
receipt this period

500.00

Signature of Contributor (Print Name)
Date (month, day, year)

Contributor's Name (Print full name)

Contributor's Name (Print full name)

Home, mailing address and ZIP code
 National Caucus of Labor Committees

W. 29th Street
 York, N.Y. 10001

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

03/16/75

Amount of each receipt this period

\$600.00

Home, mailing address and ZIP code

as above

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

09/03/75

Amount of each receipt this period

200.00

Home, mailing address and ZIP code

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

Place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

Percent of total receipts (nearest 1%)

**Remized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 2 of 2 for

LINE NUMBER 15

(Use separate schedule 1 for each numbered line.)

Committee
Street, P.O.
City, D.C. 20541

Name of Candidate or Committee in full

Committee to Elect LaRouche

Full Name, mailing address and ZIP code

National Caucus of Labor Committees

Principal place of business

231 W. 29 St.

Occupation

Political Action Group

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$ 1,250**

Date (month,
day, year)

3/1/76

**\$1,250
contribution
included**

Amount of cash
receipt this year

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this year

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this year

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this year

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this year

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this year

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **\$**

**Contributions, Ticket Purchases, Loans,
Rebates and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on Page 1)

Use separate schedule for each
contributor listed

How Contribution
Made, etc.
D.C. 20543

Name of Candidate or Committee in full
Committee to Elect LaRouche

Full Name, mailing address and ZIP code

**National Caucus of Labor Committees
231 W. 29 St. New York, Ny 10001**

Date (month,
day, year)

8/1/76

Amount of each
receipt this period

\$2500

Principal place of business

Occupation

political action group

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$ 3,750**

In-kind

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-Date **> \$**

Name, mailing address, and ZIP code

National Caucus of Labor Committees, 231 W. 29th St. NYC, NY

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ \$5,000

Date (month, day, year)

7/1/76

Amount of each receipt this period

1,250

(In-kind)

Name, mailing address, and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address, and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address, and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address, and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address, and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Signature (over the page) (Indicate all)

Signature (over the page) (Indicate all)

Committee to Elect Lyndon B. Johnson

Name, mailing address and ZIP code

National Caucus of Labor Committees

Date (month, day, year)

9/1/76

Amount of each receipt this period

\$1,250.00
(in-kind)

Principal place of business

231 W. 29 St.
New York, N.Y. 10001

Occupation

Political Action Group

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 0,250

Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Total of receipts this period (in-kind)

\$1,250.00

Total of receipts this period (in cash)

\$

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Re: NUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: Campaigner Publications, Inc.
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of Campaigner Publications, Inc. (CP) is hereby SUBPOENAED to appear at the offices of CP, 231 West 29th Street, New York, New York, on July 8, 1977, at 11:30 a.m. and to bring with him or her:

1. Records of all debts owed to CP by the Committee to Elect Lyndon LaRouche (CTEL) and the United States Labor Party (USLP) in connection with those committees' expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL and USLP; and records of all deposits of such payments.

2. All records containing a description of services rendered by CP on behalf of the 1976 campaign of Mr. LaRouche and, wherever possible, representative samples of said services.

3. Copies of CP financial statements for fiscal years 1975 and 1976.

4. Copies of any cash flow statements of CP for fiscal years 1975 and 1976.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Commone
Secretary to the Commission

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: New Solidarity International Press Service, Inc.
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of New Solidarity International Press Service, Inc. (NSIPS) is hereby SUBPOENAED to appear at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 8, 1977, at 11:00 a.m. and to bring with him or her:

1. Records of all debts owed to NSIPS by the Committee to Elect Lyndon LaRouche (CTEL) and the United States Labor Party (USLP) in connection with those committees' expenditures on behalf of the 1976 presidential campaign of Mr. LaRouche; records of all payments received from CTEL and USLP; and records of all deposits of such payments.

2. All records containing a description of services rendered by NSIPS on behalf of the 1976 presidential campaign of Mr. LaRouche and, whenever possible, representative samples of said services.

3. Copies of NSIPS financial statements for fiscal years 1975 and 1976.

4. Copies of any cash flow statements of NSTPS for fiscal years 1975 and 1976.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Emerson
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77)

Subpoena to Produce Books,
Records, and Other Relevant
Documents

TO: United States Labor Party
231 West 29th Street
New York, New York

At the instance of the Federal Election Commission pursuant to 2 U.S.C. §437d(a)(3), an officer or managing agent of the United States Labor Party (USLP) is hereby SUBPOENAED to appear at the offices of USLP, 231 West 29th Street, New York, New York, on July 8, 1977, at 9:30 a.m. and to bring with him or her:

1. Any records which document expenditure entries (see attached copies) in USLP reports which bear the notation "Creditor of NCLC" including any record which describes:
(a) the explicit purpose for which it was made; or (b) the person(s) making the expenditure.
2. Records of payments by USLP to Niles Realty, as well as records of payments to the National Caucus of Labor Committees (NCLC) for rent and utilities.
3. A copy of the rental agreement between USLP and its lessor.
4. Records of expenditures made by USLP on behalf of the LaRouche Presidential Campaign, including but

not limited to all television shows on which Mr. LaRouche appeared, and all expenditures to Campaigner Publications and New Solidarity International Press Service. This should include copies of invoices between USLP and all vendors which USLP used on behalf of the LaRouche Presidential Campaign.

5. Records of all loan agreements of USLP with commercial establishments and documentation of the security on which these loans were based.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Connors
Secretary to the Commission

10 Day Period Ending 11/1/76

11/1/76 - 10/1/76

U.S. Line Party

Full Name, mailing address and ZIP code John P. ... 4 West Highland Pittsburgh Pa.	Purpose of Expenditure Organizational Services	Date (month, day, year) 5/3/76	Amount of each expen- diture this period 350
Full Name, mailing address and ZIP code Robert Stron Woodlawn Avenue Madison, Connecticut 05443	Purpose of Expenditure Reimbursement for travel expenses	Date (month, day, year) 5/4/76	Amount of each expen- diture this period 20
Full Name, mailing address and ZIP code Bill Engdahl 74 Washington Apt. 603 New York, N.Y. 10033	Purpose of Expenditure Consulting Services	Date (month, day, year) 5/11/76	Amount of each expen- diture this period 90
Full Name, mailing address and ZIP code C & P Telephone P.O. Box 2123 Washington, D.C. 20053	Purpose of Expenditure Baltimore Office Telephone	Date (month, day, year) 5/13/76 6/02/76 6/21/76	Amount of each expen- diture this period 150 500 300
Full Name, mailing address and ZIP code Miles Pinsky 201 West 21st Street New York, New York 10001	Purpose of Expenditure To credit of NOLC 201 W. 20th Street for Rent	Date (month, day, year) 5/25/76 8/13/76 8/17/76 8/19/76	Amount of each expen- diture this period 500 600 600 600
Full Name, mailing address and ZIP code Pine & Riverview 14 Court Street Room 305 Brooklyn, New York 11201	Purpose of Expenditure To credit of Warren Harriman 231 S. Pinchurst New York, N.Y. for organizational svcs.	Date (month, day, year) 5/27/76 6/13/76	Amount of each expen- diture this period 225 225
Full Name, mailing address and ZIP code Century Tonal Supply Co. 34 West 20th Street New York, New York	Purpose of Expenditure Toilet paper	Date (month, day, year) 5/28/76	Amount of each expen- diture this period 22.63
Full Name, mailing address and ZIP code Parade Duplication & Supply Corp. 121 Grand Street New York, New York	Purpose of Expenditure Micrograph supplies	Date (month, day, year) 5/28/76 7/01/76	Amount of each expen- diture this period 45.75 45.75

11/1/76

Labor Party

Full Name, mailing address and ZIP code
 Low & H. Smith & Co. Stationery Co.
 Sixth Avenue
 New York, New York

Purpose of Expenditure

Stationery

Date

6/18/76

Amount of each expenditure this period

23.40

7/16/76

24.51

Full Name, mailing address and ZIP code

Edison
 Irving Place
 New York, New York

Purpose of Expenditure

To Creditor of
 NCIC
 for Utilities

Date (month, day, year)

6/23/76

Amount of each expenditure this period

500.

Full Name, mailing address and ZIP code

Audio Label

Purpose of Expenditure

Typing

Date (month, day, year)

6/28/76

Amount of each expenditure this period

83.

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Joe Tobin
 55-42 251st St.
 Little Neck, N.Y.

Purpose of Expenditure

Public Relations
 (letter writing
 services)

Date (month, day, year)

7/02/76

Amount of each expenditure this period

300.

Full Name, mailing address and ZIP code

Dorf Air Service
 245 West 27th Street
 New York, New York 10001

Purpose of Expenditure

Air freight
 Labor Party literature
 overseas

Date (month, day, year)

7/03/76

Amount of each expenditure this period

514.

7/13/76

480.02

9/09/76

150.

7/19/76

309.32

Full Name, mailing address and ZIP code

Stephen Pepper or Marcia Mary Pepper
 110 Bennett Avenue
 New York, New York 10033

Purpose of Expenditure

Raikaizing
 " "
 " "

Date (month, day, year)

7/16/76

Amount of each expenditure this period

200.

8/20/76

150..

8/16/76

150.

Full Name, mailing address and ZIP code

Midwest Publishers Supply Corp.
 4540 North Olcott Ave.
 Chicago, IL 60656

Purpose of Expenditure

Graphic supplies
 " "

Date (month, day, year)

7/16/76

Amount of each expenditure this period

64.

8/24/76

49.00

Subtotal of all expenditures

\$3,001.00

Subtotal of all expenditures

8

Labor Union

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monsey Industrial Supply Corp. 23 Broadway New York, New York	Office Maintenance Supplies	7/16/76	34.50
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sunny YWCA 15 West 25th Street New York, New York	Room Rental	7/18/76	55.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Campaigner Publications 231 West 29th Street New York, New York 10001	On Account " " " " " "	7/26/76 8/06/76 8/11/76 9/28/76	70. 50. 15. 35.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Campaigner Publications same as above	" " " " " "	10/01/76 10/05/76 10/07/76	50. 175. 75.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Hiles Paul 231 West 29th Street New York, New York 10001	To Creditor of NCLC -- for rent 231 W. 29th St. New York, N.Y. 10001	8/25/76 9/02/76 9/03/76 9/07/76	600. 600. 600. 600.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Hiles Paul same as above	Same as above	9/13/76 9/16/76	600. 600.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Eugene Inch, M.D. 145 Parkway Place Brooklyn, N.Y. 11207	Reimbursement ?	8/27/76	300.
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Plush Graphics Products 10001 J. Edgar Avenue New Jersey 07302	In-house printing	8/31/76	450.00

Total \$4,300.

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Marcia Merry Pepper
P. O. Box 1972
G.P.O. New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL).

Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 2:30 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Campbell
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Laurence Hecht
P. O. Box 1972
G.P.O. New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL).

Notice is hereby given that the deposition is to be taken at the offices of CTCL, 231 West 29th Street, New York, New York, on July 14, 1977, at 9:00 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Enmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MOR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Lyndon LaRouche
Chairman, National Caucus of Labor Committees
Chairman, United States Labor Party
231 West 29th Street
New York, New York

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 with regard to contributions to the Committee to Elect Lyndon LaRouche (CTEL), alleged reporting violations by the National Caucus of Labor Committees (NCLC), alleged excessive contributions by NCLC, and alleged reporting violations by the United States Labor Party (USLP). Notice is hereby given that the deposition is to be taken at the offices of CTCL, 231 West 29th Street, New York, New York, on July 14, 1977, at 4:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

William W. Brown
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Edward Spannaus
9 Cabrini Boulevard
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) and Campaigner Publications, Inc. (CP) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 9:00 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Cronson
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Nancy Spannaus
9 Cabrini Boulevard
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) and Campaigner Publications, Inc. (CP) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 10:30 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. [Signature]
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Marjorie Mazel
231 West 29th Street
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 1:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Commey
Secretary to the Commission

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon Oral Examination

TO: Ellen Berg
231 W. 24th Street
Apt. 17B
New York, New York

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 with regard to alleged corporate contributions by New Solidarity International Press Service, Inc. (NSIPS) to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of NSIPS, 231 West 29th Street, New York, New York, on July 15, 1977, at 2:30 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Cannon
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Richard E. Welsh
709 West 176th Street
New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL). Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 10:30 a.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereto set his hand at Washington, D.C. on this 21st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Margaret W. Connors
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: NUR 398 (77) Subpoena to Appear for Deposition Upon
Oral Examination

TO: Dr. Stephen Pepper
110 Bennett Avenue
Apt. 4B
New York, New York

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 with regard to contributions made to the Committee to Elect Lyndon LaRouche (CTEL), alleged corporate contributions by Campaigner Publications, Inc. to the United States Labor Party (USLP) and the Committee to Elect Lyndon LaRouche (CTEL), and alleged reporting violations by USLP. Notice is hereby given that the deposition is to be taken at the offices of CTEL, 231 West 29th Street, New York, New York, on July 14, 1977, at 1:00 p.m. and at any and all adjournments then and there specified.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. on this 91st day of June, 1977.

Thomas E. Harris
Thomas E. Harris
Chairman for the
Federal Election Commission

ATTEST:

Marianne W. Commey
Secretary to the Commission

ATTACHMENT 4

LAW OFFICES

PAUL D. KAMENAR

1712 EYE STREET, N.W.

SUITE 1010

WASHINGTON, D.C. 20006

(202) 338-5580

FEDERAL ELECTION
COMMISSION
JUL 5 PM 1:07

July 1, 1977

The Honorable Thomas E. Harris
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

The Commission has sent twelve subpoenas signed by you by certified mail to the U.S. Labor Party, the Committee to Elect LaRouche, and other persons associated therewith. Those subpoenas were received in New York on June 27 and June 28; the return dates of the subpoenas are July 8 and July 15.

On behalf of those persons, I tried unsuccessfully to contact the Commission's General Counsel several times on June 30 and July 1 for the purposes of determining the possibility of obtaining a temporary adjournment. Apparently because of the press of other business, the General Counsel was unable to return my calls. However, on late Friday, July 1, his assistant, Charles Steele, did call and we discussed the matter of an adjournment inasmuch as none of the named persons in the subpoenas have obtained counsel with respect to those subpoenas and that additional time was needed to review the documents and materials requested, and to prepare and assemble them for production.

Mr. Steele stated that he could not grant such an extension of the return dates and that the decision must be made at the Commission level pursuant to a request in writing by me. He did indicate that the three week extension suggested by me would probably be denied.

Therefore, on behalf of the named individuals and organizations, I request an adjournment of two weeks so that the return date of July 8 be extended to at least July 22 or at any time thereafter at the convenience of the Commission, and that those returnable by July 15 be extended to July 22, or at any time thereafter at the convenience of the Commission. The reasons for the extension have been stated, namely, that the persons have not obtained counsel in New York as of July 1, that they are actively seeking such counsel, but that it appears that any such counsel will not be retained within a sufficient amount of time by the return dates in order to provide effective assistance of counsel. Furthermore, the subpoenas

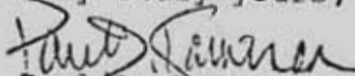
July 1, 1977

Page Two

request many records, documents, financial statements, deposit tickets and receipts, and other materials which appears will take more time than that provided to review, gather, prepare and assemble such documents. This request should not be construed to waive any rights or privileges of the persons named in the subpoenas. I am acting herein solely in the capacity of requesting the adjournment on behalf of the named parties and in the capacity of receiving a reply from the Commission with respect to the relief requested.

Your prompt consideration of this matter will be greatly appreciated.

Very truly yours,


Paul D. Kamenar

cc: William Oldaker, FEC
General Counsel

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MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645

ATTACHMENT 5

western union

Mailgram



2-036893F188002 07/07/77 ICS IPMTZZ CSP WSHR
1 2025234115 HGM TDMT WASHINGTON DC 07-07 0137P EST

RECEIVED
JUL 8 AM 10:10

ACC #4843

772050

FEDERAL ELECTION COMMISSION B VANGELDER
1325 K ST NORTHWEST
WASHINGTON DC 20463

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2025234115 TDMT WASHINGTON DC 59 07-07 0137P EST

FMS JOEL D JOSEPH, DLR

1712 I ST NORTHWEST SUITE 1010

WASHINGTON DC 20006

ON JULY 7, 1977 THE COMMISSION DENIED THE REQUEST OF YOUR CLIENTS
CTEL, USLP AND NCLE FOR AN EXTENSION OF TIME IN WHICH TO COMPLY WITH
THE SUBPOENAS ISSUED IN CONNECTION WITH HUR398. WE ARE AMENABLE TO
CHANGING THE RETURN DATE OF THE SUBPOENAS FROM JULY 8 1977 UNTIL
JULY 11 1977. PLEASE ADVISE US OF YOUR CLIENTS DECISION.

CHARLES A STEELE ACTING GENERAL COUNSEL

13:37 EST

HGMCOMP HGM

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA, 22645

western union

Mailgram



2-036554E180002 07/07/77 ICS IPMTZZ CSP WSHR
1 2025234115 MGM TDMT WASHINGTON DC 07-07 0133P EST

JUL 8 AM 10:14

ACC 844

FEDERAL ELECTION COMMISSION B VANGELDER
1325 K ST NORTHWEST
WASHINGTON DC 20463

772049

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2025234115 TDMT WASHINGTON DC 61 07-07 0133P EST

PMS PAUL KAMENAR, DLR

4712 J ST NORTHWEST SUITE 1010
WASHINGTON DC 20006

ON JULY 7 THE COMMISSION HAS DENIED YOUR REQUEST FOR AN EXTENSION OF
TIME AND WHICH TO COMPLY WITH SUBPOENAS ISSUED IN CONNECTION WITH
MUR398. WE ARE AMENABLE TO CHANGING THE RETURN DATE OF THE SUBPOENAS
FROM JULY 8 1977 UNTIL JULY 11 1977. PLEASE ADVISE WHAT YOUR CLIENTS
NEW SOLIDARITY INTERNATIONAL PRESS SERVICE AND CAMPAIGN OF
PUBLICATIONS DECIDE TO DO

CHARLES N STEELE ACTING GENERAL CONSEL

-13135 EST

CMGNCOMP MGM

ATTACHMENT 6

Before the Federal Election Commission

In the Matter of:)

The Committee to Elect Lyndon LaRouche) MUR 398
United States Labor Party
National Caucus of Labor Committees)
New Solidarity International Press Service, Inc.)
Campaigner Publications, Inc.)

STIPULATION

As a result of the representations of counsel for the above-named parties, Gregory J. Perrin, Esq. hereby agrees and stipulates to the following:

1. Counsel will direct the accumulation of documents subpoenaed by the Federal Election Commission June 26th and 27th and will have them available for review by the Commission on Wednesday July 20, 1977 at 10 a.m. at 231 West 29th Street, New York, New York and continuing until complete.

2. Counsel further represents that he believes that substantially all of the documents requested by the Federal Election Commission can be reviewed by the Federal Election Commission without further delay.

3. Counsel further represents that any challenges to any subpoena or document requested will be specific and not based on any need for delay in reviewing or accumulating materials.

4. Counsel further represents that he Gregory J. Perrin is the sole counsel for the above-mentioned parties in respect to MUR 398.

5. The depositions which were scheduled on Thursday, July 14, 1977 and Friday July 15, 1977 will be rescheduled at a time following the completion of the review of the requested documents.

Gregory J. Perrin
JULY 8, 1977

Eric Van Gelder
ERIC VAN GELDER

Telegram

ACC 943

LL9183 WAE231(1714) (2-057211E200)PD 07/19/77 171419 271 26

ICS IPMMTZZ CSP

2125638650 TDMT NEW YORK NY 129 07-19 0514P EST

PMS FEDERAL ELECTION COMMISSION, ATTN BIZ VAN GELDER, DLR

1325 K ST NORTHWEST

WASHINGTON DC 20463

I HAVE BEEN PREPARING TO MEET WITH YOU TOMORROW CONCERNING THE
 SUBPOENAS. I WAS ADVISED FOR THE FIRST TIME THIS AFTERNOON THAT THE
 SUBPOENAS WILL NOT BE COMPLIED WITH. THE REPRESENTATIVES OF THE FIVE
 ENTITIES HAVE ADVISED ME THAT IT IS THEIR POSITION THE SUBPOENAS ARE
 NOT ENFORCIBLE IN THAT; THEY ARE BEING USED TO GATHER THE NAMES OF
 CONTRIBUTORS AND SUPPORTERS FOR THE PURPOSE OF HARASSMENT; THE FEC
 -- IS BIASED; THE FEC IS ENGAGING IN SELECTIVE ENFORCEMENT OF THE ACT;
 -- THE SUBPOENAS ARE BEING USED TO OBTAIN DISCOVERY OF CIVIL CASES; THE
 FEC IS ACTING AS AN AGENT FOR THE JUSTICE DEPARTMENT IN AN
 CONTINUING INVESTIGATION; THE ACT IS UNCONSTITUTIONAL. I REGRET ANY

SF-1201 (RS-67)

(1714) (2-057211E200) 2/2

1977 JUL 19 PM 6:26

INCONVENIENCE TO YOU AS A RESULT OF MY CLIENTS POSITION. THANK YOU
 FOR YOUR COURTESY

GREGORY J PERRIN

NNNN

AGREEMENT

Page 1
FEB 23 1976
J.B.

The Committee to Elect Lyndon LaRouche (hereafter CTEL)
and

The National Caucus of Labor Committees (hereafter
NCLC), hereby agree to the following terms:

(1) CTEL agrees to pay to NCLC \$8,990 each month, for
a twelve-month period, beginning January 1, 1976 and
ending January 1, 1977; payments are to be due on
the last day of each month.

(2) In consideration for such payments, the NCLC agrees
to make available to CTEL for use, office space, util-
ities, and phone facilities in each of the local offices
of the NCLC in the following cities, as well as at NCLC
National Headquarters in New York City:

- a) Baltimore, Maryland
- b) Boston, Massachusetts
- c) Buffalo, New York
- d) Charlotte, North Carolina
- e) Chicago, Illinois
- f) Detroit, Michigan
- g) Denver, Colorado
- h) Newark, New Jersey
- i) Philadelphia, Pennsylvania
- j) San Francisco, California
- k) Seattle, Washington
- l) Washington, D.C.
- m) Hartford, Connecticut
- n) New York, New York

Use of such facilities by CTEL shall commence on

Committee to Elect Lyndon LaRouche

Marcia Merry Pepper

Marcia Merry Pepper, Chairman

National Caucus of Labor Committees

Antony Papert

Antony Papert, National Committee

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3

The National Caucus of Labor Committees (hereafter NCLC), hereby agree to the following terms:

(1) CTCL agrees to pay to NCLC \$8,990 each month, for a twelve-month period, beginning January 1, 1976 and ending January 1, 1977; payments are to be due on the last day of each month.

(2) In consideration for such payments, the NCLC agrees to make available to CTCL for use, office space, utilities, and phone facilities in each of the local offices of the NCLC in the following cities, as well as at NCLC National Headquarters in New York City:

- a) Baltimore, Maryland
- b) Boston, Massachusetts
- c) Buffalo, New York
- d) Charlotte, North Carolina
- e) Chicago, Illinois
- f) Detroit, Michigan
- g) Denver, Colorado
- h) Newark, New Jersey
- i) Philadelphia, Pennsylvania
- j) San Francisco, California
- k) Seattle, Washington
- l) Washington, D.C.
- m) Hartford, Connecticut
- n) New York, New York

Use of such facilities by CTCL shall commence on January 1, 1976 and cease on December 30, 1976.

for the Committee to Elect Lyndon LaRouche:

03040371113

FBI Ltr to
id. 2-14-78
JFC

US Labor Party

1-12 MAY 1976
1-12 MAY 1976

NATIONAL CAUCUS OF LABOR COMMITTEES

215

PAY TO THE
ORDER OF

U.S. Labor Party

Aug. 16 1976

2-340
710

\$600.-

Six hundred and 00/100

DOLLARS

Amalgamated
Trust Bank
Savings Bank
Chicago, Illinois 60603

Richard E. Welsh

000215 07100340 092153100

0000060000

NATIONAL BROADCASTING COMPANY, Inc.

30 ROCKEFELLER PLAZA • NEW YORK, N.Y. 10020

ADJUSTMENT BILLING

CORRECTED COPY

DATE 11/9/76

NUMBER 99-11063

NAME AND ADDRESS:

U.S. Labor Party
231 W. 29th Street
New York, N.Y. 10001

FOR INFORMATION ABOUT THIS
BILLING WRITE TO:

TREASURER'S DEPARTMENT, ROOM 1015W
NATIONAL BROADCASTING COMPANY, INC.
30 ROCKEFELLER PLAZA
NEW YORK, N.Y. 10020

CLIENT:

Lyndon LaRouche, President of the US

SHOW DATE	PROGRAM	CLIENT	AGENCY	ST. ORP.	ORIGINAL INVOICE NUMBER	AMOUNT
		99986	36965	TT	21-00000	

IN REFERENCE TO

YOUR REMITTANCE OF: DATE _____ CHECK NO. _____ AMOUNT \$ _____

Advance payment estimated cost TV time
Monday 11/1/76 10:00-10:30 PM (NYCT)
TV Time (Net) 91,035.00
Integrated Network (Net) 892.50
TOTAL 91,927.50

91,927.50

EASE REPLY TO _____ BY _____ YOUR ANSWER WILL HELP US KEEP YOUR ACCOUNT IN BALANCE.

5. WITHHOLDINGS, PREEMPT AND FAILURE TO TELECAST: NBC reserves the right to withhold or preempt all or any portion of any telecast in order to present over its television network a special presentation and NBC agrees that in the event of such withholding or preemption, so much advance notice as is practicable will be given to Agency. In the event of such a preemption or withholding which involves the cancellation of a sponsorship hereunder, or in the event of a failure to telecast a sponsorship hereunder due to unavailability of technical facilities, a defect or breakdown of lines or equipment, labor dispute, governmental action, scheduling or technical error or any cause beyond the control of NBC, whether of a similar or dissimilar nature, NBC's liability therefor shall be limited solely to cancellation of all charges to Agency hereunder for such sponsorship and such failure to telecast shall not constitute a breach of this Agreement, provided that no such cancellation of charges shall be allowed where the failure to telecast is due to an act or omission of Agency or Advertiser.

6. TERMINATION. NHC may terminate any or all of the sponsorships created by this Agreement as well as in its opinion may be required in order to afford equal opportunities to other legally qualified candidates for political office.

7. DEFENSE AND INDEMNIFICATION

3) **NMF Obligation:** NMF, at its own expense will defend any litigation instituted by others against Agency. Advertiser or officers, directors or employees of either for alleged violation of nondiscriminatory performing rights in copyrighted musical compositions asserted hereunder as to which NMF advises Agency it has such performing rights under general nondiscriminatory license, and it will indemnify and hold harmless Agency, Advertiser, and officers, directors or employees of either against loss or damage arising from violation of such rights.

D) Agency Obligations: Except for the foregoing, or as may be separately written agreement to otherwise expressly provided, Agency will not incur expense defend any and all litigation instituted by others against NME, the licensee, owners and operators of any station, or their officers, directors or employees, resulting from the release of sponsorship hereunder, or from any matter or material supplied by Agency or Advertiser, or spoken by any person furnished by Agency or Advertiser, and Agency will indemnify and hold harmless NME, its licensee, owner or operator and their officers, directors or employees against and from any and all claims, liability, loss and damage, including reasonable attorney's fees caused by, or arising wholly or in part out of the telecast thereof. NME's acceptance or approval of a sponsorship hereunder for telecast will not affect Agency's obligation to defend and indemnification.

C. Notice and Duration. The foregoing obligations for defense and indemnification shall be imposed only if and with in a reasonable time after the first writing of process upon the indemnitee, the indemnitor, seeks in the indemnitor's written notice (herein, and a written request to defend the litigation, and (2) while such litigation is pending, the indemnitor, upon request, shall furnish to the indemnitor all relevant facts and documents material to the former's prosecution or under its control, and shall make its employees or other persons under its control with knowledge of relevant facts available to the indemnitor for consultation and as witnesses in the jurisdiction in which they are located. The indemnitor's rights and defense obligations hereunder shall survive the termination or expiration of this Agreement and Agreement's status as agent of Advertiser.

D) Letter of Indemnity: In addition to the indemnities provided above, Agents agree that prior to the indemnity referred on above, it will furnish to NBC a written letter of Indemnity on one of NBC's standard indemnity forms signed by each sponsor or other person appearing in a political advertisement hereunder.

1. REVISION OF AGENCY FINISHED REPORT
MAILED

A) Unless otherwise agreed to by NHC in writing, all material, talent and compositions for the sponsorship program will be furnished by and at the expense of Agency. Unless otherwise agreed to by NHC in writing, all contracts for sponsorship/ talent and/or in the case of writing, pictures or other recorded program material, copies of such pictures or material including the full text of all speeches, the names of all speakers at other programs to appear, the names of all musical compositions proposed to be used, the titles of such compositions if changed, the names of composers, authors and publishers of such compositions, and the manner in which

such compositions are performed must be furnished to NBC at least seven (7) days in advance of each transmission, except that such material must be furnished at least thirty (30) days in advance of Sunday or Monday telecasts. Subject to the provisions of Section 315 of the Communications Act of 1934, NBC shall have the right to reject such compositions, songs, musical pictures, or other recorded telecast material and to refuse to broadcast any material which NBC believes to be defamatory or otherwise actionable, or which is not in its opinion conform to the program or operating policies and standards of NBC. With respect to musical compositions proposed to be performed, NBC will so advise as reasonably practicable after the receipt of the foregoing material furnished to Agency a list of such compositions as are acceptable for telecast.

If the user agency fails to furnish any relevant material, subject to the agreement as herein provided, or in the event NHI discontinues any material, patent or announcement furnished to it, Agency and Agency fails to furnish substantially identical material to NHI, NHI will, without prejudice to any other rights it may have under the circumstances, furnish and relevant such material, patent or announcement as it deems desirable, and Agency agrees to reimburse NHI for the entire cost thereof. No such action on the part of NHI shall release Agency of its obligation to keep Government of all changes as provided for here.

9. MATERIALS AND METHODS OF ANALYSIS OF ADVERTISING

Liability arises out of damage to the loss of any material or property furnished by Agency or Advertiser for use on or in connection with newscasts or broadcasts, except for damage or loss caused by the demonstrable negligence of SRC or its employees. In no event will SRC be responsible for damage to or loss of any such material or property left with SRC for any extended period, except such material or property so left pursuant to written agreement of the parties specifically identifying the same. Unless otherwise agreed to in writing, SRC retains all the rights in news, people, costumes and other material furnished to SRC.

16. GENERAL DISCUSSION

With this Agreement in with an Advertiser acting on its own behalf, the term "Agency" as used herein shall be deemed to mean "Advertiser", and all references to Agency commissions shall be deleted herefrom.

1st. This Agreement is made subject to all Federal, State and Municipal laws and regulations now in force and in force and coming into force and in force in the future, except as otherwise herein specifically provided, without the consent of NLRB and shall be governed by the laws of the State of New York, excluding all principles of federal or the laws of other jurisdictions which might otherwise be applicable under doctrine of conflict of laws. Agency and Administrative agreement and warrant that this Agreement is a consensual relationship arrangement exclusively between NLRB and Administrative and that no subordinate arrangement in policy, rule or exchange has taken place or will take place between Administrative and any other person or entity. Rights of rights resulting from breach of any provision herein which are not deemed to constitute a waiver of rights resulting from any provision or succeeding breach of the same or any other provision. Except as herein otherwise specifically provided, this Agreement constitutes the entire agreement between the parties relating to the subject matter hereof, and may not be amended, modified, revised, extended, terminated or discontinued except by an agreement in writing, signed by the parties, and upon the termination of the change, modification, renewal, extension, termination or discharge is sought.

11. This Agreement is made subject to the provisions in the current NHI Industrial Contract Manual, copies of which have been provided by Agency and may be obtained from NHI.

(D) Summaries in Agency and NII formats shall be given by postpaid mail or expedited delivery by TWA if both parties have the consent in the Agency of the addressee and in the persons, places, shown above and to NII at 30 Rockefeller Plaza, New York, New York, 10020. Attention of Publishers International Union (PIU) Network. The date of such mailing or delivery to the telegraph office or TWA transmission shall be deemed the date of service.

USE OF NON-ANTIDOTED: This Agreement is one binding upon NIM until rescinded by a subsequent authorized NIM, and delivered in Agency's possession; the above Agreement is null and void if NIM is the original Agency.

NATIONAL BROADCASTING COMPANY, INC.

By

Miss Turner

U.S. LABOR PARTY RECS
London-Rouche Committee
(Agency)

By Richard E. W. Est

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FEDERAL ELECTION COMMISSION

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3-8-3

WASHINGTON, D.C. 20463

000-21

REPORT OF RECEIPTS AND EXPENDITURES
FOR A
POLITICAL COMMITTEE
SUPPORTING ANY CANDIDATE(S) FOR NOMINATION OR ELECTION TO
FEDERAL OFFICE

76030200429
33740371117

UNITED STATES LABOR PARTY
(Full Name of Committee)
231 W. 29 ST
NYC NY 10001
(Street)
☐ Check if New Address
(City, State, ZIP code)

TYPE OF ELECTION

☐ PRIMARY ☒ GENERAL ☐ SPECIAL ☐ RUNOFF ☐ CONVENTION OR CAUCUS

TYPE OF REPORT

☐ 10 DAY PRE-ELECTION ☐ 30 DAY POST-ELECTION
☐ APRIL 10 ☐ AMENDMENT TO _____ REPORT
☐ JULY 10 ☐ SUSPENSION
☒ OCTOBER 10 ☐ TERMINATION
☐ JANUARY 10

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS REPORT INCLUDING SCHEDULES AND
MENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND COMPLETE.

Robert E. White
Signature of Treasurer of Committee
Oct 7, 1975
Date

RETURN COMPLETED REPORT AND ATTACHMENTS TO:
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

Name of Committee UNITED STATES HOUSE OF REPRESENTATIVES

REPORT COVERING PERIOD FROM SEP 25, 1975 THRU SEP 30, 1975

	Column A This period	Column B Calendar year to date
SECTION A - RECEIPTS		
Part 1. Individual contributions:		
a. Itemized (use schedule A*)	\$ 6.25	
b. Unitemized	\$	
Total individual contributions	\$ 6.25	\$
Part 2. Sales and collections:		
Itemized (use schedule B and as necessary schedule A*)	\$ 0	\$ 0
Part 3. Loans received:		
a. Itemized (use schedule A*)	\$	\$
b. Unitemized	\$ 0	\$ 0
Total loans received	\$ 0	\$ 0
Part 4. Other receipts (refunds, rebates, interest, etc.):		
a. Itemized (use schedule A*)	\$	\$
b. Unitemized	\$ 0	\$ 0
Total other receipts	\$ 0	\$ 0
Part 5. Transfers in:		
Itemize all (use schedule A*)	\$ 0	\$ 0
TOTAL RECEIPTS	\$ 6.25	\$ 0
SECTION B - EXPENDITURES		
Part 6. Void. Use Part 9.		
Part 7. Expenditures for personal services, salaries, and reimbursed expenses:		
a. Itemized (use schedule D*)	\$	\$
b. Unitemized	\$ 0	\$ 0
Total expenditures for personal services, salaries, and reimbursed expenses	\$ 0	\$ 0
Part 8. Loans made:		
a. Itemized (use schedule D*)	\$	\$
b. Unitemized	\$	\$
Total loans made	\$ 0	\$ 0
Part 9. Media and other expenses:		
a. Itemized (use schedule C*)	\$	\$
b. Unitemized	\$ 0	\$ 0
Total other expenditures	\$ 0	\$ 0
Part 10. Transfers out:		
Itemize all (use schedule D*)	\$ 0	\$ 0
TOTAL EXPENDITURES	\$ 0	\$ 0
SECTION C - CASH BALANCES		
Cash on hand at beginning of reporting period	\$ 0	
Add total receipts (section A above)	\$ 6.25	
Subtotal	\$ 6.25	
Subtract total expenditures (section B above)	\$ 0	
Cash on hand at close of reporting period	\$ 6.25	
SECTION D - DEBTS AND OBLIGATIONS		
Part 11. Debts and obligations owed to the committee (use schedule E*)	\$ 0	
Part 12. Debts and obligations owed by the committee (use schedule F*)	\$ 0	

*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

Name of Committee

U.S. Labor Party

REPORT COVERING PERIOD FROM

Oct. 1, 1975

THRU

Dec. 31, 1975

SECTION A - RECEIPTS:

Part 1. Individual contributions:

a. Itemized (use schedule A*)

b. Unitemized

Total individual contributions

Part 2. Sales and collections:

Itemized (use schedule U and as necessary schedule A*)

Part 3. Loans received:

a. Itemized (use schedule A*)

b. Unitemized

Total loans received

Part 4. Other receipts (refunds, rebates, interest, etc.):

a. Itemized (use schedule A*)

b. Unitemized

Total other receipts

Part 5. Transfers in:

Itemize all (use schedule A*)

TOTAL RECEIPTS

SECTION B - EXPENDITURES:

Part 6. Void. Use Part 9.

Part 7. Expenditures for personal services, salaries, and reimbursed expenses:

a. Itemized (use schedule D*)

b. Unitemized

Total expenditures for personal services,
salaries, and reimbursed expenses

Part 8. Loans made:

a. Itemized (use schedule D*)

b. Unitemized

Total loans made

Part 9. Media and other expenses:

a. Itemized (use schedule C*)

b. Unitemized

Total other expenditures

Part 10. Transfers out:

Itemize all (use schedule D*)

TOTAL EXPENDITURES

SECTION C - CASH BALANCES:

Cash on hand at beginning of reporting period

Add total receipts (section A above)

Subtotal

Subtract total expenditures (section B above)

Cash on hand at close of reporting period

SECTION D - DEBTS AND OBLIGATIONS:

Part 11. Debts and obligations owed to the committee (use schedule I*):

Part 12. Debts and obligations owed by the committee (use schedule I*):

*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

U.S. Labor Party

(Full Name of Candidate or Committee)

Part No. 1

(Use for itemizing Part 1, 2, 3, 4, or 5)

(Use separate page(s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (If self-employed, also check box)	Amount of Receipt This Period
		Aggregate Year-to-Date \$	
10/29/75	Janet Mandel 279 4th Ave. E. Orange, NJ	<input type="checkbox"/>	This period \$10-
		Aggregate Year-to-Date \$10-	
10/29/75	K. Martin Keller 32290 Dolly Madison Dr. Madison Hgts, MI	<input type="checkbox"/>	This period \$50-
		Aggregate Year-to-Date \$50-	
12/22/75	Geoffrey Horlick 215 W. 92nd St. N.Y., N.Y. 10025	<input type="checkbox"/>	This period \$15-
		Aggregate Year-to-Date \$15-	
Various		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	
		<input type="checkbox"/>	This period \$
		Aggregate Year-to-Date \$	

TOTAL THIS PERIOD \$75-
(Last page of this Part only)

ITEMIZED EXPENDITURES - COMMUNICATIONS AND NON-MEDIA OR OTHER EXPENDITURE

U.S. Labor Party

(Full Name of Candidate or Committee)

3 7 1 1 2 3

Part No. 9

(Use for Itemizing Part 8 or 9)

(Use separate page(s) for each numbered Part)

DATE OF PAYMENT (month, day, year)	PAYEE (Recipient of Payment)		PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (X) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURE BY CANDIDATE (To be completed only by Committee supporting more than one candidate)
	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (If self-employed, also check box)		Primary	General	Special	House	Caucus or Convention		
11/4/75	Scottco Communications N.Y.C.		Videotapes	X					\$156.52	
11/7/75	Michael J. Taggart 2-6 Bremer Tax Center 435 Lexington Ave. NYC, 10017		Accounting services	X					135.-	
11/17/75	Campaigner Publications, Inc. 231 W. 29 St. N.Y., N.Y. 10001		Printing of U.S.L.P. 1976 Calendars	X					180.-	
12/1/75	Same		Same	X					150.-	
12/23/75	Same		Same	X					200.-	

SCHEDULE E

DEBTS AND OBLIGATIONS

U.S. Labor Party

(Full Name of Committee)

Part No. *12*

(Use for itemizing Part 11 or 12)

(Use separate page(s) for each numbered Part)

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place and business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date*	Outstanding Balance at Close of This Period
<i>12/1/75</i>	<i>Campaigner Publications, Inc. 231 W. 29th St. N.Y., N.Y. 10001</i>	<i>\$550.-</i>	<i>\$530.-</i>	<i>\$20.-</i>
TOTALS THIS PERIOD (Last page of this Part only)		<i>\$550.-</i>	<i>\$530.-</i>	<i>\$20.-</i>

*Enter amount of debt or obligation paid
for given amount.

*Enter amount of debt or obligation
for given amount.

5010-10-75

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1. Name of Candidate (Print Name)
 2. Address (Print Address)
 3. City, State, Zip
 4. Date of Birth (MM/DD/YYYY)
 5. Date of Election (MM/DD/YYYY)
 6. Date of Report (MM/DD/YYYY)
 7. Date of Campaign (MM/DD/YYYY)
 8. Date of Campaign (MM/DD/YYYY)
 9. Date of Campaign (MM/DD/YYYY)
 10. Date of Campaign (MM/DD/YYYY)

11. Date of Campaign (MM/DD/YYYY)
 12. Date of Campaign (MM/DD/YYYY)
 13. Date of Campaign (MM/DD/YYYY)
 14. Date of Campaign (MM/DD/YYYY)
 15. Date of Campaign (MM/DD/YYYY)
 16. Date of Campaign (MM/DD/YYYY)
 17. Date of Campaign (MM/DD/YYYY)
 18. Date of Campaign (MM/DD/YYYY)

19. Date of Campaign (MM/DD/YYYY)
 20. Date of Campaign (MM/DD/YYYY)
 21. Date of Campaign (MM/DD/YYYY)
 22. Date of Campaign (MM/DD/YYYY)
 23. Date of Campaign (MM/DD/YYYY)
 24. Date of Campaign (MM/DD/YYYY)
 25. Date of Campaign (MM/DD/YYYY)
 26. Date of Campaign (MM/DD/YYYY)

Section A - Cash Balance Summary		Column A 1948 Period	Column B 1949 Period
1. Cash on hand January 1, 1948			\$ 406.72
2. Cash on hand at beginning of reporting period			\$ 406.72
3. Funds raised (From line 19)			\$ 310.36
4. Total (Add lines 2 and 3)			\$ 717.08
5. Total expenditures (From line 25)			\$ 3528.80
6. Cash on hand at close of reporting period (Subtract line 5 from line 4)			\$ 367.28
Section B - Expenditures Subject to Limitation - Campaign			
(To Be Used Only By The District Committee Reporting Expenditures)			
7. Operating expenditures (From line 20)			\$ 3528.80
8. Total (From line 7)			\$ 0.
9. Total expenditures subject to limitation (Subtract line 8 from line 7)			\$ 3528.80
10. Expenditures subject to limitation (Subtract line 9 from line 6)			\$ 367.28
11. Total expenditures subject to limitation (Subtract line 10 from line 9)			\$ 367.28

12. Signature of Candidate (Print Name)
 13. Signature of Treasurer (Print Name)
 14. Signature of Secretary (Print Name)
 15. Signature of Treasurer (Print Name)
 16. Signature of Secretary (Print Name)
 17. Signature of Treasurer (Print Name)
 18. Signature of Secretary (Print Name)

19. Signature of Treasurer (Print Name)
 20. Signature of Secretary (Print Name)
 21. Signature of Treasurer (Print Name)
 22. Signature of Secretary (Print Name)
 23. Signature of Treasurer (Print Name)
 24. Signature of Secretary (Print Name)
 25. Signature of Treasurer (Print Name)
 26. Signature of Secretary (Print Name)

Party	Amount	Total
PART I - RECEIPTS	Column A Part I, 1	Column B Part I, 2
1. Contributions from individuals		
(a) From individuals (see Schedule A)	\$ 114.05	
(b) From individuals (see Schedule A)	\$ 243.00	
(c) Total (see Schedule A)		
(d) From individuals (see Schedule A)	\$ 357.05	\$
2. Contributions from corporations		
(a) From corporations (see Schedule A)	\$	
(b) From corporations (see Schedule A)	\$	
(c) Total (see Schedule A)	\$	
(d) From corporations (see Schedule A)	\$	
3. Contributions from unions		
(a) From unions (see Schedule A)	\$	
(b) From unions (see Schedule A)	\$	
(c) Total (see Schedule A)	\$	
(d) From unions (see Schedule A)	\$	
4. Contributions from political parties		
(a) From political parties (see Schedule A)	\$	
(b) From political parties (see Schedule A)	\$	
(c) Total (see Schedule A)	\$	
(d) From political parties (see Schedule A)	\$	
5. Total Receipts	\$ 357.05	\$
PART II - EXPENDITURES		
20. Operating Expenses (Committee for Raising Federal Funds Include Fundraising, Travel and		
Accounting Expenses)		
(a) From individuals (see Schedule B)	\$ 5081.20	
(b) From individuals (see Schedule B)	\$ 162.50	
(c) Total (see Schedule B)	\$ 5243.70	
(d) From individuals (see Schedule B)	\$	
21. Independent Expenditures (see Schedule B)		
(a) From individuals (see Schedule B)	\$	
(b) From individuals (see Schedule B)	\$	
(c) Total (see Schedule B)	\$	
(d) From individuals (see Schedule B)	\$	
22. Gifts, Loans, Royalties, and Contribution Refunds Made		
(a) From individuals (see Schedule B)	\$ 125.00	
(b) From individuals (see Schedule B)	\$	
(c) Total (see Schedule B)	\$	
(d) From individuals (see Schedule B)	\$	
23. For Use of Party, Committee, Campaign, or Political Society, Except Fundraising, Travel and		
Accounting Expenses		
(a) From individuals (see Schedule B)	\$	
(b) From individuals (see Schedule B)	\$	
(c) Total (see Schedule B)	\$	
(d) From individuals (see Schedule B)	\$	
24. Total Expenditures	\$ 5243.70	\$
PART III - NET ASSETS AND LIABILITIES		
25. Net Assets and Liabilities at Beginning of Campaign (see Schedule C)		
26. Net Assets and Liabilities at End of Campaign (see Schedule C)	\$ 15136.16	
PART IV - NET ASSETS AND LIABILITIES, NET OF TRANSFERS TO AND FROM		
AFFILIATED COMMITTEES		
27. Net Assets and Liabilities at Beginning of Campaign	\$ 5760.30	
28. Net Assets and Liabilities at End of Campaign	\$ 5104.30	
29. Net Assets and Liabilities at End of Campaign	\$ 3420.50	
30. Net Assets and Liabilities at End of Campaign	\$ 1240.30	
31. Net Assets and Liabilities at End of Campaign	\$	
32. Net Assets and Liabilities at End of Campaign	\$	

Confidentiality of records

1985

Dec. 22 to 27 Dec. 11, 1974

THE FINE F. DRACO

Discussion

14. *Effect of Temperature on the Rate of*
Ammonia Volatilization 145

U.S. Tenthredinidae

270 Union St.

North Dakota, Hwy. 1000000

Occupation

☐ Check if Cardholder is not applying for
Annual Yearly fee \$

Mark S. Dowling

461 State St.

Albany, New York 12203

Discussion

☐ Check if *Chorizanthe* is self-sprigged

Delivery Effort

c/o Mazur

New York, N.Y. 10040

34 Hillside Avenue Apt. 302

Occupation

11. Check if Contributor is still employed.
Aggregate Years: 10

Concussion

11. Check if Gas cylinder is not empty
 12. Check if Gas cylinder is not empty

— "H. J. Haverhill"

501 West 131 St. Apt 43

New York, New York 10033

Description

1) Check if Contractor is self-employed.
 Answer: Yes or No

1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 26

11/17/13

1. Name: **Harry**

2. Date of Birth: **10/10/1935**

3. Name, title, address and ZIP code Paula Salabini	4. Occupation Bookkeeper, New York 10023	5. Date (month, day, year) 12/17/13	6. Amount \$
7. Name, title, address and ZIP code Harry L. Salabini	8. Occupation 300 Haven Avenue New York, New York 10023	9. Date (month, day, year) 12/17/13	10. Amount \$
11. Name, title, address and ZIP code Frank J. Salabini	12. Occupation 120 Riverside Drive New York, New York 10027	13. Date (month, day, year) 12/23/16	14. Amount \$
15. Name, title, address and ZIP code Tom Cooper	16. Occupation Sturgis, South Dakota	17. Date (month, day, year) 12/23	18. Amount \$
19. Name, title, address and ZIP code James O. Salabini	20. Occupation 285 J Street Salt Lake City, Utah 84103	21. Date (month, day, year) 12/27	22. Amount \$
23. Name, title, address and ZIP code	24. Occupation	25. Date (month, day, year)	26. Amount
27. Name, title, address and ZIP code	28. Occupation	29. Date (month, day, year)	30. Amount

3371130

$$\frac{1}{2} \left(\frac{1}{2} + \frac{1}{2} \right) = \frac{1}{2}$$

Confidentiality International Press
 Building #231 West 29th St.
 New York, New York 10001

111 West 20th St,
New York, New York 10011

12/1
12/1
12/1

12/31
12/31

12/12/12

1992-1993

To Controller of NCLC
in Baltimore, Md.

33/

100 York St., New York

2004年 第1期

12/1

[illegible]

33740371133

9-4

Statement for

Period from 1/1/77 to 12/31/77

Name, address, and ZIP code of donor	Date (month, day, year)	Amount of payment (in dollars and cents)	Date (month, day, year)	Amount of payment (in dollars and cents)
The General of Labor Council of 1011 29th St. N.E. Atlanta, Ga. 30309	1/1 1/1 1/1	1000.00 1000.00 1000.00		
" "	1/1 1/1	1000.00 1000.00		
" "				
" "				
" "				
" "				
" "				
" "				
Total		16150.00	16193.52	151306.16

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

77-10027 P12: 56

Commission
F.
20463

Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

Name of Candidate or Committee (in full) ☐ Check if name or address is changed

U.S. LABOR PARTY

Address (number and street)

31 W. 29th St.

City, State and ZIP code

New York, N.Y. 10001

Is this Report (Check appropriate box and complete, if applicable)

Amendment For ☐ (a) ☐ July 10 Quarterly Report

☐ (b) ☐ October 10 Quarterly Report

☐ April 10 Quarterly Report

☐ Termination Report

Twelfth day report preceding election on _____ in the State of _____

(primary, general or convention) (date)

Thirtieth day report following election on _____ in the State of _____

(primary, general or convention) (date)

Candidate or Committee Summary of Receipts and Expenditures

Period From _____ Through _____

Section A - Cash Balance Summary

Amount on hand July 1, 19 _____

Amount on hand beginning of reporting period _____

Receipts (From line 12) _____

Total (Add lines 7 and 8) _____

Expenditures (From line 13) _____

Amount at close of reporting period (Subtract line 9 from line 8) _____

Amount of items on hand to be liquidated (From line 14) _____

Section B - Presidential Campaign Expenses Subject to Limitation Summary

(To Be Filed Only by Presidential Candidates Receiving Federal Funds)

Reg. expenditures (From line 20) _____

Gifts and Debts (From line 17) _____

Expenditures subject to limitation (Subtract line 13 from line 12) _____

Expenditures from prior years subject to limitation _____

Total expenditures subject to limitation (Add lines 15a and 14b) _____

Amount of these expenditures that are the best of any kind and type and that are strictly private and complete

(Type name of Treasurer or Candidate) _____ (date) _____

Commission of false or untrue or fraudulent information may subject a person signing this Report to the penalties of 2 U.S.C. § 1172 or 1173 (which are subject to fine)

Any information reported herein may not be copied for sale or use by any person for any commercial purpose.

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20543

2 Identification Number

C00021832

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☐ No

(b) If "Yes," for which election?

(general, primary, runoff) on _____ (date)

(c) ☐ January 31 Year End Report

(d) ☐ Monthly Report _____ (Month)

(e) ☐ Termination Report

Column A
This Period

Column B
Calendar Year To Date

\$ 115.75

\$ 6,836.17

\$ 95,122.13 \$ 120,725.24

\$ 102,256.65 \$ 116,003.40

\$ 97,500.03 \$ 4,606.62

\$ 4,606.62 \$ 4,606.62

\$ 27,500.03

\$

\$

\$

\$

\$

\$

\$

\$

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Commission
No. 100
C. 1976

of Candidate or Committee
U.S. LABOR PARTY

PERIOD COVERING THE PERIOD
FROM: **10/19/76** TO: **11/22/76**

RECEIPTS

Contributions and other income:

(a) Itemized (Use Schedule A)

(b) Unitemized

(c) Sales and Collections Included Above:

List by event on memo Schedule D (S 37,535.00)

(d) Subtotal of contributions and other income

Loans and Loan Repayments Received:

(a) Itemized (Use Schedule A)

(b) Unitemized

(c) Subtotal of loans and loan repayments received

Refunds, Rebates, Returns Received:

(a) Itemized (Use Schedule A)

(b) Unitemized

(c) Subtotal of refunds, rebates, returns

Transfers In:

(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)

(b) From Other Committees (Itemize on Schedule A Regardless of Amount)

(c) Subtotal of transfers in

Total Receipts

EXPENDITURES

Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenses):

(a) Itemized (Use Schedule B)

(b) Unitemized

(c) Subtotal of operating expenditures

Transfers Out:

(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)

(b) To Other Committees (Itemize on Schedule B Regardless of Amount)

(c) Subtotal of transfers out

Total Expenditures

For Use Only by Political Campaigns Receiving Federal Funds, Except Fundraising, Legal and Accounting Expenses:

(a) Itemized (Use Schedule B)

(b) Unitemized

(c) Subtotal of political campaign expenditures

Transfers Out:

(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)

(b) To Other Committees (Itemize on Schedule B Regardless of Amount)

(c) Subtotal of transfers out

Total Expenditures

DEBTS AND OBLIGATIONS

Debts and obligations owed to the Committee (Itemize on Schedule C)

Debts and obligations owed by the Committee (Itemize on Schedule C)

RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES

Total Receipts (From line 10)

Total Expenditures (From line 17(a))

Total Receipts (Subtract line 20 from line 20)

Total Expenditures (From line 20)

Total Receipts (From line 21(a))

Total Expenditures (Subtract line 32 from line 31)

Column A

This Period

Column B

Calendar year to date

\$ 18,625.00

\$ 21,115.48

\$ 72,770.48

\$ 22,650.00

\$ 22,650.00

\$

\$

\$

\$

\$

\$ 95,120.18

\$ 27,037.50

\$ 472.53

\$ 27,560.03

\$

\$

\$

\$

\$

\$

\$ 97,560.03

\$

\$ 111,126.21

\$ 91,120.18

\$

\$ 91,120.18

\$ 27,560.03

\$

\$ 27,560.03

A.
Commission
14 W.
C. 20453

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

1 Candidate or Committee in full

U. S. LABOR PARTY.

Name, mailing address and ZIP code

Frank Berg
3419 Hillford Drive
Baltimore, Md.

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

10/31/76

Amount of each
receipt this period

\$ 75.00

Name, mailing address and ZIP code

George Simms
3501 Eastern Ave.
Baltimore, Md. 21234

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Name, mailing address and ZIP code

Minnie Corvalho
156 Denver St.
Rochester, N.Y.

Principal place of business

Hight Forking

Occupation

Attendant

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Name, mailing address and ZIP code

Ellie Kuzon
174 Redwade Terrace
Rochester, N.Y.

Principal place of business

Union of Rochester

Occupation

Secretary

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Name, mailing address and ZIP code

Edward Egan, John Egan
RFD #1 Route
Albany, N.Y. 12205

Principal place of business

Occupation

Farmer - Self Employed

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

10/31/76

Amount of each
receipt this period

500.00

Name, mailing address and ZIP code

David Smith
165 W. 5th Street
Schenectady, N.Y.

Principal place of business

Cowgo Hospital

Schenectady, N.Y.

Occupation

Nurse

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

1,500.00

Subtotal of receipts this page (foot only) > \$ 2,335.00

Total this period (last page this line number only) > \$

**Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEN Form 3**
 (see instructions on back)

LINE NUMBER 15
 (Use separate schedule(s) for each
 numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY.

Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Bruce Fisher 25 Prospect Forestville, N.Y.	Auto Worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	100.00
Ford Stamping Plant Hamburg, N.Y.			
Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Steve Gilbreth 1408 Arborview Ann Arbor, Mich. 48103	Postal Worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	10/30/76	300.00
U.S. Post Office Ypsilanti, Mich.			
Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Rev. Kahle St. Meinard College St. Meinard, Ind. 47577	Priest <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	10/31/76	1,500.00
Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Lawrence Esposito 770 Humphrey Rd. Lancaster, Pa.	Construction Worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	300.00
Laurel Horne Constr. Co. Lancaster, Pa.			
Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Lore Edwards 500 Upson Avenue Lipson, Pa. 19013	Social Worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	10/31/76	100.00
Community Interactions Inc. 3425 Garrett Rd. Drexel Hill, Pa.			
Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
George & Dennis Everingham 44 Valley Forge Rd. Lansdale, Pa. 19446	work w/ Mentally Retarded <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	10/31/76	150.00
Ken Crest Centers			
Total of receipts this page (optional)			> \$ 3,450.00
Total this period (last page this line number only)			> \$

to A

tion Commission
et. No. W.
D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(Use Instructions on back)

Page 3 of for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY

Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Rebecca Pascienier 507 S. 42nd St. Philadelphia, Pa.	Waitress <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	\$ 585.00
Riverfront Restaurant Del + Poplar St. Philadelphia, Pa.	Electrician <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	300.00
Ed De Buist 2314 Garret Rd. -3C Upper Merion, Pa.	Manufacturing Rep. <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	200.00
John Woodall 6015 Kingsessing Ave. Philadelphia, Pa.	Construction <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	100.00
Country Eaton 41 W. Delaware Ave. Mantoloking, N.J. 08055	Computer Programmer <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	500.00
James Eaton 41 W. Delaware Ave. Mantoloking, N.J. 08055	 <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date Δ \$	11/1/76	300.00
Subtotal of receipts this page (optional) Δ \$			1,585.00
Total this period (last page this line number only) Δ \$			

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Section Commission
et. N.W.
O.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 4 of for
LINE NUMBER 15
(Use separate schedule for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY

Name, mailing address and ZIP code

James M. Viggiano, Jr.
921 S. Clinton Avenue
Trenton, N.J. 08611

Principal place of business

Youth Reception Center
Yardville, N.J.

Occupation

Psychologist

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 100.00

Name, mailing address and ZIP code

Jim J. Ellis, Jr.
131 Park Rd.
Fort Mitchell, Ky. 41011

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

300.00

Name, mailing address and ZIP code

Klein Merriman
3124 W. 68th St.
Cleveland, Ohio 44102

Principal place of business

Market Street Exchange
Room 201 - W. 25th St. 4
Cleveland

Occupation

Writer

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

400.00

Name, mailing address and ZIP code

Gene Inch
30 Berkeley Place
Brooklyn, N.Y. 11217

Principal place of business

Occupation

Doctor

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

150.00

Name, mailing address and ZIP code

Ruth Kuzinsky
15 Russell Place
Roseton, N.Y. 11570

Principal place of business

Occupation

housewife

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Name, mailing address and ZIP code

James Goldwater
30 Westwood Rd.
Great Neck, Long Island

Principal place of business

Occupation

housewife

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Subtotal of receipts this page (optional)

> \$ 1,150.00

Total this period (last page this line number only)

> \$

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 5 of for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

on Commission
N.W.
C. 20463

Name of Candidate or Committee in full

U.S. LABOR PARTY

Name, mailing address and ZIP code

**Richard B. Katz
382 Woodsworth Avenue-6B
New York, N.Y.**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 50.00

Name, mailing address and ZIP code

**W. Stuart PeHingell
23 Duncorn Avenue
Jersey City, N.J.**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Name, mailing address and ZIP code

**Robert Zall
135-05 Huerter Avenue, New Gardens, Queens
New York, 11435**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Name, mailing address and ZIP code

**Jo Alford
14 W. 9th St.
New York, N.Y. 10015**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Name, mailing address and ZIP code

**Paul Gallagher
1326 Riverside Drive
New York, N.Y. 10033**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

1,050.00

Name, mailing address and ZIP code

**William Paciencia
65 Myson Ave.
New York, N.Y. 10034**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Total of receipts this page (optional)

\$ 1,450.00

Total this period (first page this line number only)

\$

File A

Section Commission
West, N.W.
N. O.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 6 of for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Full Name, mailing address and ZIP code Roe Tobin 900 West 190th St. S-H New York, N.Y. 10040 Principal place of business	Occupation Housewife <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period \$ 1,000.00
Full Name, mailing address and ZIP code Abe Chertoff 47 Riverdale Ave. A-37 Manhasset, N.Y. 10701 Principal place of business	Occupation Retired <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period 100.00
Full Name, mailing address and ZIP code Lydia Diller 309 West 109th St. New York, N.Y. Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period 500.00
Full Name, mailing address and ZIP code Richard E. Freeman 2 S. Pinehurst Avenue New York, N.Y. 10033 Principal place of business	Occupation Clerk Typist <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period 100.00
Full Name, mailing address and ZIP code Steve Persons 554 W. 181 St. New York, N.Y. Principal place of business	Occupation Clerk Typist <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period 500.00
Full Name, mailing address and ZIP code Laurie Tertelbaum 615 Bayson Avenue New York, N.Y. 10034 Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▷ \$	Date (month, day, year) 11/1/76	Amount of each receipt this period 100.00

Subtotal of receipts this page (optional) **▷ \$ 2,300.00**
 Total this period (last page this line number only) **▷ \$**

1-A

tion Commission
st, N.W.
D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 1 of 1 for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

of Candidate or Committee in full

U.S. LABOR PARTY

Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Mark Stahlman 317 Haven Avenue New York, N.Y. 10033	Programmer <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	500.00
Computron 212 Center Avenue Fort Lee, N.J.			
Morris Levitt 538 Riverside Drive New York, N.Y. 10027	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	100.00
Dorothy Nesmith 231 W. 25th St. New York, N.Y. 10001	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	50.00
Virginia Combothekras 1 McComb Blvd. New York, N.Y. 10033	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	50.00
Thomas Molner 500 W. 181 St. #26 New York, N.Y. 10033	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	50.00
Philip Litniewsky 553 West 315 Street - F9 New York, N.Y. 10034	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date > \$	11/1/76	350.00
Sume			
Subtotal of receipts this page (optional)			> \$ 1,000.00
Total this period (last page this line number only)			> \$

A

Commission
No. 20483

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

LINE NUMBER 15(Use separate schedule(s) for each
numbered line)

Candidate or Committee in full

S. LNEOR PARTY.

Name, mailing address and ZIP code

Winston German

New York

Local place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Name, mailing address and ZIP code

Richard Schulman

59 W. 109th St.

New York, N.Y. 10025

Local place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Name, mailing address and ZIP code

Mr. Gus Komodore

2-45-34th St. Apt. 3R

Long Island City, N.Y. 11103

Local place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Name, mailing address and ZIP code

Wrick Koechlin

25 Cumming Street

New York, N.Y. 10034

Local place of business

Occupation

Toby Toggys, Inc.

100-10 33rd St.

Brooklyn, N.Y. 10001

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

120.00

Name, mailing address and ZIP code

Jeff Greenwald

Local place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Local place of business

Fishes

Name, mailing address and ZIP code

Mike Leppig

17 Price St.

Sayreville, N.J. 08872

Local place of business

Occupation

Unempl.

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Total of receipts this page (optional) > \$

470.00

Total this period (last page this line number only) > \$

Rule A

Section Commission
New York, N.Y.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page 9 of 10 for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY.

Full Name, mailing address and ZIP code

**Dianne Stephens
73 Seamon Avenue
New York, N.Y. 10034**

Principal place of business

Occupation

Housewife

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Full Name, mailing address and ZIP code

**Ellis Seowell
88-10 Whitney Ave.
Elmhurst, N.Y. 11373**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Full Name, mailing address and ZIP code

**Mary Lou Shovron
1137 Riverside Drive
New York, N.Y. 10032**

Principal place of business

Occupation

Public Health Researcher

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

200.00

Full Name, mailing address and ZIP code

**Charlotte Moriarty #2
715 West 173 St.
New York, N.Y. 10032**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Full Name, mailing address and ZIP code

**Edmund R. Corl
612 West 138th St. #52
New York, N.Y. 10040**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Full Name, mailing address and ZIP code

**Joe Stein
337 W. 30th St.
New York, N.Y. 10001**

Principal place of business

Occupation

traffic clerk

☐ Check if Contributor is self-employed

Aggregate Year-to-date **\$**

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Total of receipts this page (optional)

\$ 600.00

Total this period (last page this line number only)

\$

Itemized Receipts,
Contributions, Ticket Purchase, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 10 of for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY

Full Name, mailing address and ZIP code

Dorian Bartlett
85 Columbia St.
New York 10002

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 50.00

Full Name, mailing address and ZIP code

Michelle Steinberg
34 Hillside Avenue
New York, N.Y. 10040

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

75.00

Full Name, mailing address and ZIP code

Michael J. Green
73 Seamon Ave.
New York, N.Y.

Principal place of business

Carrick Service Corp.
3099 Northern Blvd.
New York, N.Y.

Occupation

Taxi Driver

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

150.00

Full Name, mailing address and ZIP code

Jim. Cottle

Principal place of business

New York

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

50.00

Full Name, mailing address and ZIP code

Mark Sonnenblick
19 Cummings St.
New York, N.Y. 10034

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

200.00

Full Name, mailing address and ZIP code

Michael T. Minicino
7 Ethel St. Apt. 5J
New York, N.Y. 10010

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

100.00

Total of receipts this page (foot only) \$ 655.00

If this period (last page this line number only) \$

Rule A

Election Commission
 Street, N.W.
 Washington, D.C. 20463

Receipts, Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3
 (See instructions on back)

Page 11 of 15 for
LINE NUMBER 15
 (Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY.

Full name, mailing address and ZIP code

**Liz Durand
 21 Irving Street
 New York, Albany**

Principal place of business

Occupation

Unemployed.

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

\$ 100.00

Full name, mailing address and ZIP code

**Chris Strunk
 20 Berkeley Place
 New York**

Principal place of business

**Vogel & Strunk Arch.
 468 Park Ave.
 New York, N.Y.**

Occupation

Jr. Architect

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

200.00

Full name, mailing address and ZIP code

**Peter Buck
 945 West End Ave-11A
 New York**

Principal place of business

**Word Power
 352 Green St.
 New York, N.Y. 10003**

Occupation

Typist

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

100.00

Full name, mailing address and ZIP code

**Carol Puyser
 105 Lenox Avenue-12A
 New York, N.Y. 10033**

Principal place of business

**141 State Tax Service
 40 W. 21st St. 10th Fl.
 New York, N.Y. 10010**

Occupation

Secretary

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

100.00

Full name, mailing address and ZIP code

**Tim Merrill
 77 Copart St.
 New York, N.Y. 10034**

Principal place of business

Occupation

Computer - Self-Employed

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

120.00

Full name, mailing address and ZIP code

**Michael Bertoff
 2 Ellwood 34
 New York, N.Y. 10040**

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date **> \$**

Date (month, day, year)

11/1/76

Amount of each receipt this period

50.00

Subtotal of receipts this page (optional)

> \$ 670.00

Total this period (last page the line number only)

> \$

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See Instructions on back)

Page 12 of for
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY

Full Name, mailing address and ZIP code

Michael R. Colpihs
945 West End Ave.
New York, N.Y. 10025

Principal place of business

Occupation

Mail Clerk

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
\$ 50.00

Full Name, mailing address and ZIP code

George Kettunen
30942 Greenland
Livonia, Mich. 48154

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
100.00

Full Name, mailing address and ZIP code

Patricia Hoffman
1716 Infantry St.
Detroit, Mich. 48209

Principal place of business

Occupation

Secretary

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
750.00

Full Name, mailing address and ZIP code

Herb Litch
3357 Cordova Avenue
Livonia, Ohio

Principal place of business

Occupation

Auto Worker

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
100.00

Full Name, mailing address and ZIP code

George Brooks
35345 Lehigh
Dearborn Heights, Mich.

Principal place of business

Occupation

Auto Worker

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
2,000.00

Full Name, mailing address and ZIP code

John Pulney
Tulsa, Okla.

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Date (month,
day, year)

11/1/76

Amount of each
receipt this period
1,350.00

Total of receipts this page (optional)

> \$ 4,250.00

For this period (last page this line number only)

> \$

Itemized Receipts:
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page 13 of 15 for
LINE NUMBER 15
(Use separate schedule for each
numbered line)

Name of Candidate or Committee in full

Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Thomas L. Simpson 1263 Ferdinand Detroit, Mich. 48209	Auto worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	\$ 100.00
Pontiac Motors Pontiac, Mich.			
Martin Keller 33290 Dolly Madison Drive Mollison Hts., Mich.	High School Teacher <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	100.00
Royal Oak Mich. High School			
Thomas R. Evans 2130 S. Sibley St. Warren, Mich. 48092	Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	200.00
Joe D'Urso 104 Central Avenue Detroit, Mich.	Lib. Technician <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	100.00
Michael K. Velho			
Robert A. Chlebos 311 Lake View, Bay, Livonia, Mich.	Millwright <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	100.00
Peter H. Nelson 1000 - 3rd St. Detroit, Mich.			
Paul Winters 154 Hawthendown Blvd. Livonia, Ohio 43114	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$	11/1/76	100.00
Total receipts this page foot on all			\$ 700.00
This period (last page this line number only)			\$

Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 17 of 17 for

LINE NUMBER 15

(The separate schedule(s) for each
numbered line)

of Chair, Vice Chair or Committee in full

Name, mailing address and ZIP code

John J. Jorvis
136-42 Orange
Apt. 10, Ohio
Cleveland, Ohio
Dehler Jorvis Co.

Occupation

Inspector

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 100.00

Name, mailing address and ZIP code

W. H. Bedy
14 W. Highland Ave.
Pittsburgh, Pa.
Pittsburgh Co.

Occupation

Sales Rep.

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 15,000.00

Name, mailing address and ZIP code

Samuel, Calif.
1000 10th St.
New York, N.Y. 10001

Occupation

Machine Operator

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 150.00

Name, mailing address and ZIP code

←
1000 10th St.
New York, N.Y. 10001

Occupation

Art Critic

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 12,000.00

Name, mailing address and ZIP code

1000 10th St.
New York, N.Y. 10001
1000 10th St.
New York, N.Y. 10001

Occupation

Tax Driver

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

11/1/76

Amount of each
receipt this period

\$ 300.00

Name, mailing address and ZIP code

1000 10th St.
New York, N.Y. 10001

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

Amount of each
receipt this period

Name, mailing address and ZIP code

1000 10th St.
New York, N.Y. 10001

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$5

Date (month,
day, year)

Amount of each
receipt this period

\$ 27,950.00

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See Instructions on back)

Page 1 of 1
LINE NUMBER 15
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

U.S. LABOR PARTY.

Full Name, mailing address and ZIP code

Paul Gerrish
12 A Pleasantview Dr.
Piscataway, N.J. 08854

Principal place of business

Youth Reception and
Correction Center
Hartsville, N.J.

Occupation

psychologist

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/22/76

Amount of each
receipt this period

\$ 500.00

Full Name, mailing address and ZIP code

Clint Mastern/ Lurreta Mastern
1609 Ethel Ave.
Rockford, Ill.

Principal place of business

Occupation

Retired

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

10/22/76

Amount of each
receipt this period

100.00

Full Name, mailing address and ZIP code

Murphy E. Soloway
800 Montclair
Newark, N.J.

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/7/76

Amount of each
receipt this period

100.00

Full Name, mailing address and ZIP code

Margaret Pratt
335 W. 4th
New York, N.Y. 10014

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

11/7/76

Amount of each
receipt this period

100.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Date (month,
day, year)

Amount of each
receipt this period

Subtotal of receipts this page (optional)

\$ 800.00

Total this period (last page this line number only)

\$ 13,625.00

A

 Form 1234
 1-76
 C-70463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (See Instructions on back)

 Page 1 of 1
 LINE NUMBER 16
 (Use separate schedule(s) for each
 number of lines).

of Candidate or Committee in full

U.S. LABOR PARTY

Name, mailing address and ZIP code

**Barley Perovich
 1311 W. Hickory
 Oak Park, Ill. 60302**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

11/1/76

 Amount of each
 receipt this period

\$ 1,000.00
(LOAN)

Name, mailing address and ZIP code

**Richard Thomas Hemmelt
 101 King St.
 Allentown, Pa. 18104**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

11/1/76

 Amount of each
 receipt this period

\$ 5,000.00
(LOAN)

Name, mailing address and ZIP code

**David H. Melley
 1010 1st St.
 New York, N.Y.**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

1/1/76

 Amount of each
 receipt this period

\$ 1,000.00
(LOAN)

Name, mailing address and ZIP code

**David H. Melley
 1010 1st St.
 New York, N.Y.**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

1/1/76

 Amount of each
 receipt this period

\$ 1,000.00
(LOAN)

Name, mailing address and ZIP code

**Alfred R. Brown
 40 Riverside Dr.
 New York, N.Y. 10017**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

11/1/76

 Amount of each
 receipt this period

\$ 750.00
(LOAN)

Name, mailing address and ZIP code

**John P. Brown
 1010 1st St.
 New York, N.Y. 10017**

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to Date > \$

 Date (month,
 day, year)

1/1/76

 Amount of each
 receipt this period

\$ 1,000.00
(LOAN)

Total of all receipts this period

> \$ 10,000.00

Total of all receipts (enter number only)

> \$

A

U.S. Election
 1976
 Form 20463

Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3
 (See Instructions on back)

LINE NUMBER 16

(The separate schedule(s) for each
 must be filed.)

1. Candidate or Committee in full

U.S. LINER PARTY

2. Name, mailing address and ZIP code

Ed Diller
 9 W. 109th St.
 New York, N.Y.

3. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 500.00

(10000)

4. Name, mailing address and ZIP code

Ed Kostman
 4110 116th Ave
 New York, N.Y. 10040

5. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 100.00

(10000)

6. Name, mailing address and ZIP code

Ed Turner
 66 100th St - 6F
 New York, N.Y. 10010

7. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 100.00

(10000)

8. Name, mailing address and ZIP code

Ed Turner
 66 100th St - 6F
 New York, N.Y. 10010

9. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 100.00

(10000)

10. Name, mailing address and ZIP code

Ed Kostman
 4110 116th Ave
 New York, N.Y. 10040

11. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 100.00

(10000)

12. Name, mailing address and ZIP code

Ed Kostman
 4110 116th Ave
 New York, N.Y. 10040

13. If place of business

Occupation

11. Check if Contributor is self-employed
 Aggregate Year to Date > \$

Date (month,
 day, year)

11/1/76

Amount of each
 receipt this period

\$ 100.00

(10000)

14. Total of contributions (page 1 of schedule)

\$ 1,200.00

15. Total of contributions (page 2 of schedule)

\$

Itemized Receipts,

Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page 1 of 1 for
LINE NUMBER 16
(Use separate schedule(s) for each
numbered line).

A
FEC Commission
New York
C. 20462

of Candidate or Committee in full

U.S. Labor Party

Name, mailing address and ZIP code James Roman Stohlan, 11 Riverside Place, New York, N.Y. (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period \$ 1,500.00
Occupation Illustrator		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Name, mailing address and ZIP code John Scamman-Block 14 Cummings Rd. New York, N.Y. 10024 (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period 600.00
Occupation (LOAN)		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Name, mailing address and ZIP code John Scamman-Block 14 Cummings Rd. New York, N.Y. 10024 (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period 200.00
Occupation (LOAN)		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Name, mailing address and ZIP code John Scamman-Block 14 Cummings Rd. New York, N.Y. 10024 (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period 100.00
Occupation (LOAN)		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Name, mailing address and ZIP code John Scamman-Block 14 Cummings Rd. New York, N.Y. 10024 (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period 900.00
Occupation (LOAN)		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Name, mailing address and ZIP code John Scamman-Block 14 Cummings Rd. New York, N.Y. 10024 (place of business)	Date (month, day, year) 11/1/76	Amount of each receipt this period \$ 2,000.00
Occupation (LOAN)		
<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year to Date > \$		

Total of receipts (if self-employed) **> \$ 7,000.00**

Total of receipts (if self-employed) **> \$**

to A
 25
 Election Commission
 Wash, D.C.
 20543

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (See Instructions on back)

Page 1 of 1
LINE NUMBER 1
 (Use separate schedule for each numbered line).

Name of Candidate or Committee in full

U.S. Labor Party

Home, mailing address and ZIP code

**Martina Zellers
 354 Westchester Ave.
 New York, N.Y. 10040**

Place of business

Occupation

(LOAN)
 unemployed

13 Check if Contributor is self-employed

Applicable Year to Date **> 5**

Date (month, day, year)

11/1/76

Amount of each receipt this period

\$ 900.00

Home, mailing address and ZIP code

**Virginia Comberakios
 14 Morris Blvd.
 New York, N.Y. 10033**

Place of business

Occupation

(LOAN)
 Grand Work Consultant

13 Check if Contributor is self-employed

Applicable Year to Date **> 5**

Date (month, day, year)

11/1/76

Amount of each receipt this period

\$ 400.00

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Home, mailing address and ZIP code

**David C. Kaufman
 1111 1st Ave.
 New York, N.Y. 10019**

Place of business

Occupation

Date (month, day, year)

Amount of each receipt this period

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3
(See Instructions on back)

Page 1 of 1
LINE NUMBER 20
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

U. S. Labor Party.

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Campaigner Publications 231 W. 29th St. New York, N.Y. 10001	On Account Printing	10/21/76 10/28/76 11/08/76	\$ 300.00 200.00 150.00
" "	" "	11/15/76 11/17/76 11/18/76 11/23/76	40.00 220.00 100.00 3,300.00
Leasco, Inc., creditor of Campaigner Publications (See Above)	To Creditor of Campaigner Public. <u>pro</u> On Acct. Printing	10/27/76	600.00
New Solidarity Int'l. Press Service 231 W. 29th St. Rm. 1401 New York, N.Y. 10001	On Account Research + Writing	11/22/76	400.00
NBC 30 Rockefeller Plaza New York, N.Y.	30-minute broadcast	11/01/76	83,277.50
Teletronics 231 E. 55th St. New York, N.Y. 10022	Broadcast + Production Services	11/01/76	3,500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

Subtotal of expenditures this page (optional) >

Total this period (last page this line number only) >

\$ 97,087.50

File C

Election Commission
Street, P.O. Box
Washington, D.C. 20463

Line Numbers 26 and/or 27 of FFC Form 3

(See Instructions on back)

LINE NUMBER 26

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

U. S. LABOR PARTY

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

Amount of Original Debt, Contract, Agreement, or Promise

Cumulative Payment To Date

Outstanding Balance at Close of This Period

National Councils of Labor Committees
231 W. 29th St.
New York, N.Y. 10001
(Office, Phone, Util.)

2/1/76
3/1/76
4/1/76

\$ 8,990.00
\$ 8,990.00
\$ 8,990.00

\$ 7,000.00

\$ 1,990.00
\$ 8,990.00
\$ 8,990.00

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$ 8,990.00

\$

\$ 8,990.00

5/1/76

\$ 8,990.00

\$

\$ 8,990.00

6/1/76

\$ 8,990.00

\$

\$ 8,990.00

7/1/76

\$ 8,990.00

\$

\$ 8,990.00

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$ 8,990.00

\$

\$ 8,990.00

8/1/76

\$ 8,990.00

\$

\$ 8,990.00

9/1/76

\$ 8,990.00

\$

\$ 8,990.00

10/1/76

\$ 8,990.00

\$

\$ 8,990.00

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$

\$

\$

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$

\$

\$

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$

\$

\$

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$

\$

\$

Full Name, mailing address and ZIP code, and nature of obligation

Date (month, day, year)

\$

\$

\$

Totals this period this page (optional)

\$ 90,910.00

\$ 7,000.00

\$ 73,910.00

Totals this period (last page this line number only)

\$ 126,951.19

\$ 12,524.00

\$ 114,427.19

Carry outstanding balance only, to appropriate line of summary.

Page _____ of _____ for
LINE NUMBER 15C

(see instructions on back)

Signature of Candidate James H. H. H. H.

at Proceeds during the Reporting Period:

Sale of tickets (List by event below)	Δ	\$	27,033
Mass collections (List by event below)	Δ	\$	
Sale of items	Δ	\$	
Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	Δ	\$	

Cost of Sales and Collections by Event

[illegible]

RECEIVED
FEDERAL ELECTION
COMMISSION

77 FEB 24 PM 4:14

U.S. ...

(b) ...

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1. Total of ...

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Column A
This Period

Column B
Prior Year

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(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

1/2/77

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Page 1

Committee for the U.S. House of Representatives

Committee for the U.S. House of Representatives

RECEIPTS

1. Contributions and other income:

(a) Unrestricted (see Schedule D) (Total of all unrestricted contributions and other income)

\$ 500.00

(b) Unrestricted (see Schedule D) (Total of all unrestricted contributions and other income)

\$ 553.29

(c) Gifts and Collections Included Above:

(1) Gifts and Collections Included Above:

(d) Subtotal of contributions and other income

\$ 603.29

2. Interest and Dividend Income:

(a) Interest and Dividend Income (Total of all interest and dividend income)

\$

(b) Unrestricted (see Schedule D) (Total of all unrestricted interest and dividend income)

\$

(c) Subtotal of interest and dividend income

\$

3. Income from Real Estate:

(a) Income from Real Estate (Total of all income from real estate)

\$

(b) Unrestricted (see Schedule D) (Total of all unrestricted income from real estate)

\$

(c) Subtotal of income from real estate

\$

4. Transfers:

(a) From Affiliated Committee (Total of all transfers from affiliated committee)

\$ 571.50

(b) From Other Committees (Total of all transfers from other committees)

\$

(c) Subtotal of transfers

\$

5. Total Receipts:

\$ 1,274.75

EXPENDITURES

6. Operating Expenses (Unrestricted for Operating Federal Funds (Include Fundraising, Legal and Accounting Expenses))

(a) Unrestricted (see Schedule D) (Total of all unrestricted operating expenses)

\$ 3,034.00

(b) Unrestricted (see Schedule D) (Total of all unrestricted operating expenses)

\$ 29.00

(c) Subtotal of operating expenses

\$ 3,034.00

7. Personnel Expenses (see Schedule D)

(a) Personnel Expenses (Total of all personnel expenses)

\$

8. Loans, Loan Repayments, and Contribution Refunds:

(a) Loans, Loan Repayments, and Contribution Refunds (Total of all loans, loan repayments, and contribution refunds)

\$

(b) Unrestricted (see Schedule D) (Total of all unrestricted loans, loan repayments, and contribution refunds)

\$

(c) Subtotal of loans and loan repayments and contribution refunds

\$

9. For the Only (by Presidential Campaigns) Receiving Federal Funds; External Fundraising; and Fundraising Expenses:

(a) For the Only (by Presidential Campaigns) Receiving Federal Funds; External Fundraising; and Fundraising Expenses (Total of all for the only (by Presidential Campaigns) receiving federal funds; external fundraising; and fundraising expenses)

\$

(b) Unrestricted (see Schedule D) (Total of all unrestricted for the only (by Presidential Campaigns) receiving federal funds; external fundraising; and fundraising expenses)

\$

(c) Subtotal of for the only (by Presidential Campaigns) receiving federal funds; external fundraising; and fundraising expenses

\$

10. Total Expenditures:

\$ 3,717.00

11. For Other Committees (see Schedule D) (Total of all for other committees)

\$ 653.00

12. For Other Committees (see Schedule D) (Total of all for other committees)

\$

13. Total Expenditures (Total of all expenditures)

\$ 639.00

14. Total Expenditures (Total of all expenditures)

\$ 3,717.00

NET ASSETS AND LIABILITIES

15. Net Assets and Liabilities (Total of all net assets and liabilities)

\$

16. Net Assets and Liabilities (Total of all net assets and liabilities)

\$ 132,507.11

REVENUE RECEIPTS AND EXPENDITURES NOT REPORTED TO THE FROM

APPROVED COMMISSION

(a) Revenue Receipts (Total of all revenue receipts)

\$ 1,274.75

(b) Revenue Receipts (Total of all revenue receipts)

\$ 571.50

(c) Revenue Receipts (Total of all revenue receipts)

\$ 603.29

(d) Revenue Receipts (Total of all revenue receipts)

\$ 3,717.00

(e) Revenue Receipts (Total of all revenue receipts)

\$ 653.00

(f) Revenue Receipts (Total of all revenue receipts)

\$ 3,034.00

Form 278
 1-79
 1125-10-1-79
 201-10-1-79

Itemized List of
 Contributions, Ticket Sales, Loans,
 Gifts, and Other Contributions
 Numbers 15, 16, 17 and 18 of Form 278-10-1-79
 Donor's Name (Print)

Form 278-10-1-79
 1125-10-1-79
 201-10-1-79

Contributor to 42nd Street Lyndon LaRouche

Full Name, mailing address and ZIP code

Mary J. Johnson
 328 W. 16th St.
 New York, N.Y.

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

10/31/75

Full Name, mailing address and ZIP code

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Full Name, mailing address and ZIP code

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Full Name, mailing address and ZIP code

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Full Name, mailing address and ZIP code

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Full Name, mailing address and ZIP code

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Principal place of business

Occupation

☐ Check if Contributor is self-employed
 Approx. Year in date 1975

Date (month, day, year)

Signature of Contributor (this page optional) _____

Full Name, mailing address and ZIP code (last page this line number only) _____

224

Form 1041-1 (Rev. 1-1-63)
 For the months 20, 22, 23, and 1/1/63
 of 1963

OMB APPROVED
 1545-0047
 GSA GEN. REG. NO. 27

U.S. GOVERNMENT PRINTING OFFICE

Return to Mr. J. Edgar Hoover, FBI

Name, mailing address and ZIP code Jerome London 210 W. 109th St. New York, N.Y. 10025	Purpose of Expenditure Transferred to ESOP by check of \$ 10	Date (month, day, year) 11/23/76	Amount of cash disbursed 61.00
Name, mailing address and ZIP code Barbara P. ... 321 W. 25th St. New York, N.Y. 10011	Purpose of Expenditure " "	Date (month, day, year) 11/30/76	Amount of cash disbursed 32.00
Name, mailing address and ZIP code Ed Collins Box 1231 Philadelphia, Pa.	Purpose of Expenditure " "	Date (month, day, year) 11/26/75	Amount of cash disbursed 167.00
Name, mailing address and ZIP code Ron Kastner New York, N.Y.	Purpose of Expenditure " "	Date (month, day, year) 11/20/76	Amount of cash disbursed 100.00
Name, mailing address and ZIP code Jim Rush 10 Cooper St. Apt. 5M New York, N.Y. 10034	Purpose of Expenditure " "	Date (month, day, year) 12/06/75	Amount of cash disbursed 100.00
Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of cash disbursed for this period
Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of cash disbursed for this period
Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of cash disbursed for this period

Total of cash disbursements (fill page 1041-2) > 5

Total of cash disbursements (fill page 1041-2) > 5

683.00

Committee on Labor		Amount of Disposal		Disposal		Disposal	
Committee on Labor		Total, (cents, 1/100)		Total, (cents, 1/100)		Total, (cents, 1/100)	
The Alliance to Assist Lyndon LaRouche							
Full Name, mailing address and ZIP code, and nature of obligation		Date (month, day, year)					
The Alliance to Assist Lyndon LaRouche P.O. Box 1972 New York, N.Y. 10001 (Rent, 1981.)		7/01/76		3,990.00		1,111.13	
		8/01/76		3,990.00		1,111.13	
		9/01/76		3,990.00		1,111.13	
(Rent, 1981.)		10/01/76		3,990.00		1,111.13	
		11/01/76		3,990.00		1,111.13	
		12/01/76		3,990.00		1,111.13	
Full Name, mailing address and ZIP code, and nature of obligation		Date (month, day, year)					
		10/15/75		1,007.97		1,007.97	
		11/15/75		1,007.97		1,007.97	
Campaigner Publications 231 W. 29th St. New York, N.Y. (Printing)		2/01/76		300.00		300.00	
		7/30/76		502.50		502.50	
		9/01/76		9,405.00		9,405.00	
(Advertising)		10/01/76		8,533.75		8,533.75	
		6/1/76		175.00		175.00	
		7/1/76		333.00		333.00	
(Graphics)		8/1/76		655.00		655.00	
		9/1/76		84.00		84.00	
		10/15/76		171.00		171.00	
(Graphics)		11/15/76		6.00		6.00	
		1/15/76		80.00		80.00	
		4/30/76		220.00		220.00	
(Graphics)		5/30/76		650.00		650.00	
		2/1/76		5,045.00		5,045.00	
		8/1/76		1,860.00		1,860.00	
(Video)		9/1/76		5,080.00		5,080.00	
		10/15/76		3,040.00		3,040.00	
Subtotal this period (this page) (rounded)		>		\$ 83,677.67		\$ 83,677.67	
Total this period (this page) (rounded)		>		\$		\$	
Carry over (balance only, to appear in line of summary)		>		\$		\$	

Figure 1

NEW YORK, N. Y. 10038

13-T-40 XZ1



Ralph Fink & Associates, Inc.
Certified Stenotype Reporters
140 Nassau Street
New York 10038 New York

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Att: Biz Van Gelder, Esq.

CERTIFIED

No. 225731

MAIL



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1352 Depositions

Date Filmed 1-6-83 Camera No. --- 2

Cameraman LPC



FEDERAL ELECTION COMMISSION

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

8304037426

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MR. 1352





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 9, 1982

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche
Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of your client, Citizens for LaRouche (CFL), in which CFL agreed to pay a \$15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its initial installment payment of that penalty, in the amount of \$5,000, on December 1, 1982.

It is now December 9, and no such payment has been received by the Commission. I, therefore, direct your attention to paragraph IV, section 4 of the conciliation agreement which states:

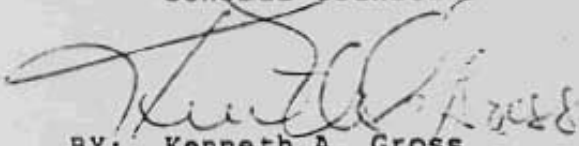
In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to respondent.

In order to avoid such an acceleration, CFL should forward a check to the Commission in the full amount due (\$5,000) prior to December 17, 1982.

This is the only notice of delinquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross.
Associate General Counsel

83040 12/9/82



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1352.

83040374266





FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1352.

8304040001



BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on January 18, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Authorize the acceleration of all CFL installment payments, thereby making the full amount (\$15,000) due ten days after written notice is received by CFL;
2. Authorize the filing of a civil action for relief against CFL and Lyndon LaRouche if full payment of the \$15,000 civil penalty is not received by February 1, 1983; and
3. Approve the letter notifying counsel for CFL of the Commission's actions as recommended by the FEC General Counsel in the report dated January 6, 1983.

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

Attest:

Jan. 18, 1983
Date

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

3304010001

January 6, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MURs 1158, 1186, 1253 and 1352

Please have the attached Memo to the Commission distributed to the Commission for the agenda of January 18, 1983 as a sensitive matter. Thank you.

Attachment

cc: Lerner

33040100016



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 6 P 1: 26

January 6, 1983

EXECUTIVE SESSION

MEMORANDUM

JAN 18 1983

SENSITIVE

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

RE: Citizens for LaRouche Conciliation Agreement - MURs
1158, 1186, 1253 and 1352

On November 5, 1982, the Commission accepted a conciliation agreement submitted on behalf of Citizens for LaRouche (CFL) in MURs 1158, 1186, 1253 and 1352, in which CFL agreed to pay a \$15,000 civil penalty to the Commission. (See Attachment I) According to the terms of that agreement CFL was to make an initial installment payment of \$5,000 on December 1, 1982, followed by ten consecutive monthly installments of \$1,000 each. The agreement further provides that if any of the installment payments is not made on time, the Commission may accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to CFL.

As of December 15, 1982, the Commission had not received CFL's initial installment payment of \$5,000. Consequently, the Office of General Counsel sent a letter to CFL's counsel notifying him of the delinquency and reminding him of the acceleration provision in the conciliation agreement. (See Attachment II) The letter also advised that CFL should forward a \$5,000 check to the Commission prior to December 17, 1982 if it wished to avoid further Commission consideration of the matter.

The Commission has not yet received a check or any other response from CFL or its attorney. The Office of General Counsel, therefore, recommends that the Commission authorize the acceleration of all the CFL installment payments, authorize the filing of a civil action for relief against both CFL and Lyndon

33040100017

Memorandum to the Commission
Page Two

LaRouche*/ in the event full payment of the accelerated amount is not received within 10 days of CFL's receipt of the Commission's notice, and approve the attached letter notifying CFL's counsel of those actions. (See Attachment IV)

Recommendation

- 1) Authorize the acceleration of all CFL installment payments, thereby, making the full amount (\$15,000) due ten days after written notice is received by CFL.
- 2) Authorize the filing of a civil action for relief against CFL and Lyndon LaRouche if full payment of the \$15,000 civil penalty is not received by February 1, 1983.
- 3) Approve attached letter notifying counsel for CFL of the Commission's actions.

Attachments

- I. Signed conciliation agreement of CFL;
- II. December 9, 1982 letter to Mayer Morganroth, counsel for CFL;
- III. Candidate certification letter submitted by Lyndon LaRouche.
- IV. Proposed letter notifying CFL's counsel of the Commission's actions.

*/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Lyndon LaRouche certified that he had read Section 9033.1 of the Commission's regulations and agreed to comply with each condition set forth, therein. (See Attachment III) Section 9033.1(9) states:

The candidate shall pay any civil penalties included in a conciliation agreement with or imposed under 2 U.S.C. § 437g against the candidate, the principal campaign committee or any authorized committee of the candidate.
(emphasis added)

As Mr. LaRouche certified that he would pay any CFL civil penalty the suit should be filed against both he and CFL.

83040400018

BEFORE THE FEDERAL ELECTION COMMISSION

52 OCT 27 PM 2:25¹

OCT 27 2:1:58

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

CONCILIATION AGREEMENT

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

- 2 U.S.C. § 441f;
- 11 C.F.R. § 110.4(c)(2);
- 2 U.S.C. § 441a(f) and;
- 26 U.S.C. § 9042(c)(1)(A).

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

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The Respondent enters voluntarily into this agreement with the Commission.

- 2 -

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

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

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

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

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

(A) MUR 1158

- (1) \$250 cashier's check in the name of Harold Harrison dated 1/14/80.
- (2) \$150 money order in the name of Anne R. Taylor dated 11/20/79.
- (3) \$1,009.58 loan check from Household Finance submitted with signature document indicating that it had been contributed by David Sanders and Lenore Sanders, his spouse, dated 1/22/80.

(B) MUR 1352

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

- 3 -

- (2) \$125 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (3) \$120 money order signed "Janice Hart" and dated 12/7/79 (no accompanying signature document).
- (4) \$100 money order signed "Paul Greenberg" and dated 12/10/79 (no accompanying signature document).
- (5) \$100 money order signed "Paul Greenberg" and dated 12/11/79 (no accompanying signature document).
- (6) \$135 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (7) \$85 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (8) \$80 money order signed "Sherri Waffle" and dated 12/7/79 (no accompanying signature document).
- (9) \$55 money order signed "William Lerch" and dated 12/7/79 (no accompanying signature document).

The Commission has not alleged that these were willful violations.

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

(A) MUR 1158

- (1) \$40 cash contribution made by Ernest Pulsifer.
- (2) \$150 cash contribution made by Ernest Pulsifer.
- (3) \$250 cash contribution made by Nancy Radcliffe.
- (4) \$400 cash contribution made by Belinda F. deGrazia.

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

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

(A) MUR 1158

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

(B) MUR 1253

- (1) \$2,713.53 in contributions from Rochelle Ascher;
- (2) \$1,742.15 in contributions from Karen Brubaker;
- (3) \$1,024.48 in contributions from John Covici;
- (4) \$1,279.55 in contributions from Joseph D'Urso;
- (5) \$3,378.34 in contributions from Elliot Eisenberg;
- (6) \$2,067.32 in contributions from Jeffrey Forrest;
- (7) \$1,409.59 in contributions from Gregory Garnier;
- (8) \$5,120.32 in contributions from Laurence Gray;
- (9) \$3,681.32 in contributions from Marjorie Mazel Hecht;
- (10) \$1,285.87 in contributions from Marsha Rokinda;
- (11) \$1,738.68 in contributions from Melvin Johnson;
- (12) \$1,763.76 in contributions from Michael Smedberg;
- (13) \$1,005.44 in contributions from Martin Simon;
- (14) \$1,507.65 in contributions from David W. Thill;
- (15) \$2,403.90 in contributions from Andrew Wilson;

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- (16) \$1,025 in contributions from August F. Arace;
 - (17) \$1,043 in contributions from James M. Duree;
 - (18) \$1,105 in contributions from Shirley Fingerman;
 - (19) \$1,030 in contributions from John Holly;
 - (20) \$1,044 in contributions from T. J. Hopkins;
 - (21) \$1,150 in contributions from Sherri S. Lightner;
 - (22) \$1,100 in contributions from John Pellicano;
 - (23) \$1,100 in contributions from John Ryman;
 - (24) \$1,120 in contributions from John J. Sakala;
 - (25) \$1,125 in contributions from Walter J. Stevens;
 - (26) \$1,010 in contributions from James Taylor;
 - (27) \$1,030 in contributions from Verne Tomlins;
 - (28) \$1,515 in contributions from Carleton Williams;
 - (29) \$1,580 in contributions from Frederic L. Young;
 - (30) \$2,375 in contributions from Donald J. Carr;
 - (31) \$2,030 in contributions from Ellen G. Scott;
 - (32) \$1,050 in contributions from Belinda F. deGrazia;
 - (33) \$1,250 in contributions from Alexander Ward;
 - (34) \$1,125 in contributions from Mary F. Cummings;
 - (35) \$1,075 in contributions from James M. Everette;
 - (36) \$1,250 in contributions from Michael Micale.

The Commisson has not alleged that these were willful violations.

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

- 6 -

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

(A) MUR 1158

- (1) \$35 money order signed "William Hayden" and dated 1/8/80.
- (2) \$150 money order signed "Ernest Pulsifor" and dated 12/4/79.
- (3) \$250 money order signed "Nancy Radcliff" and dated 9/12/79.
- (4) \$250 money order signed "Robert A. Robinson" and dated 9/12/79.
- (5) \$140 money order signed "Kevin Salisbury" and dated 1/12/80.
- (6) \$450 money order signed "Kevin Salisbury" and dated 1/21/80.
- (7) \$70 money order signed "Charles Clark" and dated 11/13/79.
- (8) \$150 money order signed "Anne R. Taylor" and dated 11/20/79.
- (9) \$45 money order signed "David Sanders" and dated 11/25/79.
- (10) \$25 money order signed "David Sanders" and dated 1/3/79.
- (11) \$1,009.58 Household Finance Company loan check endorsed by David Sanders submitted along with a signature document signed by David Sanders and Lenore Sanders, as spouse.
- (12) \$400 money order signed "Belinda F. deGrazia" and dated 1/22/80.
- (13) \$250 cashier's check and signature document for Dr. Harold Harrison.

ATTACHMENT I (6 of 9)

(B) MUR 1186

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

(C) MUR 1352

- (1) \$200 money order signed "William Lerch" and dated 11/19/79.
- (2) \$55 money order signed "William Lerch" and dated 12/7/79.
- (3) \$135 money order signed "Sherri Waffle" and dated 12/7/79.
- (4) \$85 money order signed "Sherri Waffle" and dated 12/7/79.
- (5) \$80 money order signed "Sherri Waffle" and dated 12/7/79.
- (6) \$125 money order signed "Janice Hart" and dated 12/7/79.
- (7) \$120 money order signed "Janice Hart" and dated 12/7/79.
- (8) \$100 money order signed "Victoria Lacey" and dated 12/10/79.
- (9) \$50 money order signed "Victoria Lacey" and dated 12/10/79.
- (10) \$250 money order signed "Robert Hart" and dated 12/10/79.
- (11) \$100 money order signed "Paul Greenberg" and dated 12/10/79.
- (12) \$100 money order signed "Paul Greenberg" and dated 12/11/79.

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

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

- 8 -

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

- 1) One initial payment of \$5,000, due on December 1, 1982;
- 2) Thereafter, beginning on January 1, 1983, ten consecutive monthly installment payments of \$1,000 each;
- 3) Each such installment shall be paid on the first day of the month in which it becomes due;
- 4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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

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

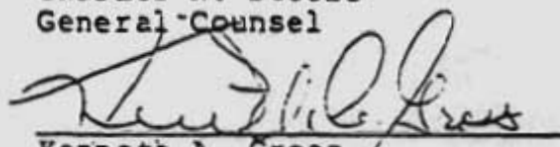
- 9 -

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

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

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

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Citizens for LaRouche

10-25-82
Date:

By: Mayer Morganroth
Counsel for Respondent



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

December 9, 1982

Walter Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche
Conciliation Agreement

Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of your client, Citizens for LaRouche (CFL), in which CFL agreed to pay a \$15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its initial installment payment of that penalty, in the amount of \$5,000, on December 1, 1982.

It is now December 9, and no such payment has been received by the Commission. I, therefore, direct your attention to paragraph IV, section 4 of the conciliation agreement which states:

In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to respondent.

In order to avoid such an acceleration, CFL should forward a check to the Commission in the full amount due (\$5,000) prior to December 17, 1982.

This is the only notice of delinquency that you will receive prior to further Commission consideration of this matter. If you have any questions contact Lois Lerner, the attorney in charge, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

A- ATTACHMENT II (1 of 1)

33040100036

Madame and Gentlemen:

Pursuant to the provisions of the Presidential Primary Matching Payment Account Act, the 'act', and the Federal Election Commission regulations promulgated thereunder, the 'regulations', I hereby certify that I am seeking the nomination of the Democratic Party to the office of President of the United States in more than one state.

I further certify that neither I nor Citizens for LaRouche, my authorized principal campaign committee, will incur qualified campaign expenses in excess of the limitations set forth under section 9035 of the regulations.

I further certify that Citizens for LaRouche has received on my behalf matchable contributions which, totaled, exceed \$5,000 in contributions from individuals who are residents of each of at least 20 states, and with respect to any individual do not exceed \$250. The information required by section 9033.2 (c) (2) of the regulations with respect to such contributions is enclosed herewith.

I further certify that I have read section 9033.1 of the regulations and I hereby agree that Citizens for LaRouche and I will comply with each condition set forth set forth in section 9033.1

Citizens for LaRouche and I specifically agree to obtain and furnish to the Commission at its request any evidence regarding qualified campaign expenses by me, Citizens for LaRouche, and all authorized committees. We will include as part of this evidence the following documentation:

For expenditures exceeding \$100 or for expenditures of less than \$100 to a payee who receives expenditures aggregating more than \$100 per year, either:

- a. a receipted bill which is from the payee which states the particulars of the expenditure -- or
- b. if such a receipted bill is not available, the following documents which will state the particulars of the expenditure:
 1. A cancelled check negotiated by the payee-- plus
 2. One of the following documents from the payee-- a bill, invoice, voucher or or contemporaneous memorandum--
 3. Where the documents specified in 2. above are not available, a voucher or contemporaneous memorandum from the candidate or Citizens for LaRouche --or
- c. if neither a receipted bill nor the documentation specified above is available, a cancelled check stating the particulars of the expenditure.

Where the supporting documentation required above is not available, Citizens for LaRouche and I may present a cancelled check and collateral evidence to document the qualified campaign expense. Such evidence may include but is not limited to: (a) evidence demonstrating that the expenditure is part of an identifiable program or project which is other-

a number of documented expenditures relating to a campaign mailing or to the operation of a campaign office-- (b) evidence that the expenditure is covered by a pre-established written campaign committee policy, such as per Diem policy, etc.

Citizens for LaRouche and I understand that the term 'particulars' means the identification of the payee, the date and amount of the expenditure, and a description of the goods or services purchased.

For all other expenditures:

- a. if from the petty cash fund, a record disclosing the identification of the payee, the amount and the date of the expenditure-- or
- b. a cancelled check which has been negotiated by the payee and states the identification of the payee, and the amount and date of the expenditure.

Citizens for LaRouche and I understand that 'payee' means the person who provides the goods and services to the committee or candidate in return for the expenditure except for an advance of \$500. or less for travel and/or subsistence to an individual who will be the recipient of the goods or services purchased.

Upon the request of the Commission, Citizens for LaRouche and I shall supply an explanation of the connection between the expenditure and the campaign.

Citizens for LaRouche and I shall keep and furnish to the Commission any books, records, including bank records for all accounts and supporting documentation for matching fund submissions, or other information that the Commission may request, as well as copies of books and records maintained by all authorized committees of the candidate.

For purposes of audit and examination pursuant to section 9038 of the regulations, and at the Commission's request, Citizens for LaRouche and I shall gather the books and records required, as stated above, in one centralized location.

Citizens for LaRouche and I shall permit an audit and examination pursuant to section 9038 of all campaign expenditures, including those made by all authorized committees-- facilitate such audit by making available office space, records, and such personnel as is necessary to conduct the audit and examination-- and pay any amounts required to be paid under section 9038.

Prior to the date of the first matching funds payment pursuant to the Act, Citizens for LaRouche and I shall submit the name and mailing address of the national or state banks designated by Citizens for LaRouche and myself as a campaign depository as required by 11 CFR part 103 and section 9037.3 of the regulations.

Citizens for LaRouche and I shall prepare matching funds submissions in accordance with the Federal Election Commission guideline for presentation in good order.

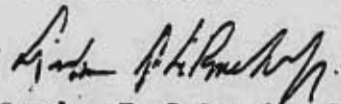
Citizens for LaRouche and I shall comply with applicable requirements of sections 431-434-437b title 2, US code and parts 100-108 of the Federal Election Commission regulations.

Citizens for LaRouche and / or I shall pay any civil penalties including
in a conciliation agreement or imposed under 2 usc section 437g
against me, the committee, or any authorized committee of mine.

13

If there are any questions regarding the above certification and
agreements , please call either Felice Gelman, treasurer of Citizens
for LaRouche, or James F. Schoener, counsel representing Citizens for
LaRouche.

Very truly yours,


Lyndon H. LaRouche, Jr.

33040100031

ATTACHMENT III (3 of 3)

ATTACH



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mayer Morganroth, Esq.
Heritage Plaza
Suite 555
24901 Northwestern Highway
Southfield, Michigan 48075

Re: Citizens for LaRouche Conciliation Agreement

Dear Mr. Morganroth:

On October 25, 1982 you entered into a conciliation agreement on behalf of Citizens for LaRouche (CFL), in which CFL agreed to pay a \$15,000 civil penalty to the Commission. According to the terms of that agreement, CFL was to have made its \$5,000 initial installment payment of that penalty on December 1, 1982, followed by ten consecutive monthly installments of \$1,000 to begin January 1, 1983. The agreement further provides that if any installment payment is not received at the Commission by the fifth day of the month in which it becomes due, the Commission may accelerate the remaining payments - causing the entire amount to become due ten days after CFL receives written notice of such an acceleration.

On December 9, 1982, the Commission notified you that it had not received CFL's initial \$5,000 installment and advised you that CFL should forward the \$5,000 payment prior to December 17, 1982, in order to avoid acceleration of the entire amount. No such payment has been received. In addition, the first \$1,000 monthly installment payment due on January 1, 1983 is now overdue.

On January , 1983, based on CFL's failure to comply with the payment schedule set forth in the conciliation agreement, the Commission authorized the acceleration of all remaining payments. Please be advised, therefore, that the entire civil penalty (\$15,000) is due ten days after your receipt of this letter. Additionally, the Commission has authorized the filing of a civil

ATTACHMENT IV (1 of 2)

- 2 -

action for relief against both CFL and Lyndon LaRouche^{*}/ in the event that payment of the entire \$15,000 is not received within 10 days of your receipt of this notice.

If you have any questions concerning the Commission's actions, please contact Lois Lerner at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

^{*}/ In the candidate certification letter submitted as part of his application for Presidential Primary Matching Funds, Mr. LaRouche agreed to pay any civil penalties assessed against CFL pursuant to a conciliation agreement.

ATTACHMENT IV (2 of 2)

per 8304010003



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MR 1352.

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