



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1403

Date Filmed 6/3/82 Camera No. --- 2

Cameraman SPC

846

20403

FEDERAL ELECTION COMMISSION

routing cards

12 day report + comment sheets

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 J. M. Brown

date 11-22-77

FEC 9-21-77

3 2 4 0 3 3 0 8 4 7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 21, 1982

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202) 523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330948



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1982

W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600 Security Pacific Plaza
333 South Hope Street
Los Angeles, California 90071

Re: MUR 1403

Dear Mr. Bickett:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

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Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330949



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1982

Mr. James Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr. Gormley:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

82040330850



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 21, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Harvill
913 Willow Avenue
Tallahassee, Florida 32303

Dear Mr. Harvill:

The Federal Election Commission has reviewed the allegations of your complaint dated December 7, 1981 and determined on the basis of the information provided in your complaint to find reason to believe that the Fund for a Conservative Majority, National Right to Life PAC, Americans for Change, National Congressional Club, General Aviation PAC, J.G. Boswell Co. Employees' PAC and National Pro-Life PAC violated 2 U.S.C. § 439(a)(2)(B). However, as each has subsequently filed the appropriate reports with the Florida Secretary of State, the Commission also determined to take no further action in this matter. In addition, the Commission found no reason to believe Life-PAC violated 2 U.S.C. § 439(a)(2)(B) since its activity in the State of Florida was not in connection with the campaign for nomination for election, or election of a candidate to the Office of Senator or Representative in the Congress (See 2 U.S.C. § 439(a)(2)(B)).

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

13034033051



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

JRM

92040330852



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600 Security Pacific Plaza
333 South Hope Street
Los Angeles, California 90071

Re: MUR 1403

Dear Mr. Bickett:

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Sincerely,

JAN

02040330853



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. James Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

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Sincerely,

JAM

32040330854



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Harvill
913 Willow Avenue
Tallahassee, Florida 32303

Dear Mr. Harvill:

3 2 0 4 0 3 3 0 8 5 3
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Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

John

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1403
General Aviation PAC)
J.G. Boswell Co. Employees PAC)
National Pro-Life PAC)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 19, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1403:

1. Take no further action against J.G. Boswell Co. Employees' PAC, General Aviation PAC and National Pro-Life PAC.
2. Close the File.
3. Approve the proposed letters as submitted with the General Counsel's Report dated May 14, 1982.

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

Attest:

5-20-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

5-17-82, 10:34
5-17-82, 4:00

32040330956

May 17, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1403

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.
Thank you.

Attachment

cc: Brown

32040330857

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

May 14, 1982

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAY 17 AIO: 34

In the Matter of

General Aviation PAC
J.G. Boswell Co. Employees PAC
National Pro-Life PAC

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MUR 1403

GENERAL COUNSEL'S REPORT

Background

A complaint received in the Office of General Counsel on December 7, 1981 under the signature of a Paul Harvill alleged that eight political committees had violated 2 U.S.C. § 439(a)(2)(B) for their failure to file the appropriate reports with the Florida Secretary of State pertaining to contributions made by each to the Paula Hawkins 1980 Senate campaign. Based on responses received as a result of the Commission's reason to believe notification and noting that the appropriate reports had been filed with the Florida Secretary of State, the Commission on March 30, 1982, found reason to believe but decided to take no further action and close the file as to four of the respondents. Three of the remaining respondents, J.G. Boswell Co. Employees' PAC (BOSPAC), General Aviation PAC (GENAVPAC), and National Pro-Life PAC (Pro-Life PAC) either failed to respond to the RTB notification or responded but failed to simultaneously file the appropriate reports with the Florida Secretary of State. Accordingly, on March 30, 1982, the Commission found reason to

32040330859

believe that BOSPAC, GENAVPAC and Pro-Life PAC violated 2 U.S.C. § 434(a)(2)(B). On that same date, the Commission found no reason to believe that the final respondent, Life PAC, violated 2 U.S.C. § 439(a)(2)(B).

Legal Analysis

Since March 30, BOSPAC, GENAVPAC and Pro-Life PAC have responded by letter to the Commission's RTB finding. Each either by letter or telephone expressed a general claim of ignorance or oversight in their failure to file the reports, however, each has also indicated that the appropriate reports have now been filed with the Florida Secretary of State (Attachments 1-3).

Conclusion

The Office of General Counsel recommends that the Commission take no further action against BOSPAC, GENAVPAC, and Pro-Life PAC and close the file since substantial compliance has been achieved.

3 2 0 4 0 3 3 0 8 5 9

Recommendation

- 1) Take no further action against J.G. Boswell Co.
Employees' PAC, General Aviation PAC and National Pro-Life PAC.
- 2) Close the file.
- 3) Approve proposed letters

May 14, 1982
Date

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from W.C. Bickett
2. Letter from James Gormley
3. Letter from Peter Gemma
4. Letter to W.C. Bickett
5. Letter to James Gormley
6. Letter to Peter Gemma
7. Letter to Paul Harvill

32040330960

A Political Action Committee
for Shareholders and Employees
of J. G. Bechtel Company

ATTACHMENT

BOSPAC
SUITE 4800, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

32 MAY 7 AIO: 13

James E. Fisher
Chairman
W. C. Bickett
Treasurer

GENERAL COUNCIL

32 MAY 7 AIO: 41

May 6, 1982

Mr. Duane Brown
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Brown:

Enclosed is a copy of the report to the Division of Elections for
the State of Florida regarding our contribution to the Paula
Hawkins for Senate Committee.

Further, we have reported our contributions made in the last quarter
of 1981 and the first quarter of 1982 to the respective states.

Sincerely,

W. C. Bickett
W. C. Bickett
Treasurer

enc.

/a

A Political Action Committee
for Stockholders and Employees
of J. O. Boswell Company

BOSPAC
SUITE 4600, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

James B. Fisher
Chairman
W. C. Bickett
Treasurer

April 16, 1982

Division of Elections
Department of State
Capitol Building
Tallahassee, FL 32304

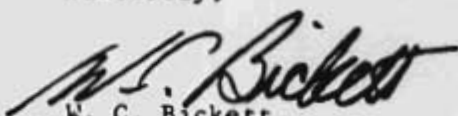
Gentlemen:

In compliance with the Federal Election Campaign Act, 2 U.S.C. 439,
this letter is to advise you of our contribution of \$4,000.00 dated
October 16, 1980 to:

Paula Hawkins for Senate
P. O. Box 12637
Tallahassee, FL 22308

A full report for all contributions is on file with the Federal Election
Commission Washington, D.C. and with the Secretary of State's Office
of the State of California.

Sincerely,


W. C. Bickett
Treasurer

/a

ATTACHMENT II

7548

82 APR 15 AIO: 0

GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 10161

WASHINGTON, D.C. 20006

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES D. GORLEY

April 13, 1982

APR 15 4:02

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

Re: MUR 1403

Dear Chairman Reiche:

I have discussed your letter of April 1, 1982, with Duane A. Brown. Per his counsel, I am forwarding excerpts of the subject report to the Florida Secretary of State, and am herewith forwarding to you a copy of that report.

I trust that you will notify us of any further requirements that might arise.

Sincerely,

James D. Gorley

Enclosure

32040330863

RECEIVED
GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 19181
WASHINGTON, D.C. 20006

82 APR 15 10:07

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES D. GORLEY

April 13, 1982

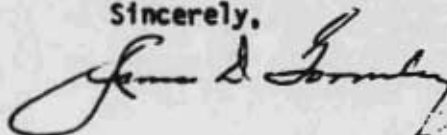
3 2 0 4 0 3 3 0 8 6 4
The Honorable George Firestone
Florida Secretary of State
The Capitol
Tallahassee, FL 32304

Dear Sir:

We have been notified by the Federal Election Commission (F.E.C.) of a complaint alleging we failed to file a copy of our Report of Receipts and Disbursements identifying a contribution to the "Paula Hawkins for U. S. Senate Committee" on October 21, 1980.

Enclosed are excerpts from our report to the F.E.C. in November 1980 identifying that contribution.

Sincerely,



Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee

(Summary Page)

82 APR 15 AID: 07

1. Name of Committee (in Full)

GENERAL AVIATION POLITICAL ACTION
COMMITTEE

Address (Number and Street)

P. O. BOX 19121

City, State and ZIP Code

WASHINGTON, D. C. 20036

☐ Check if address is different than previously reported.

2. FEC Identification Number

00014878

3. ☒ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☒ Thirtieth day report following the General Election
on 4 Nov '80 in the State of Federal
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period 15 October Through 24 Nov. 1980

6. (a) Cash on Hand January 1, 1980

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and
lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A This Period	Column B Calendar Year-to-Date
	\$ 30,117.22
\$ 28,956.23	
\$ 0	\$ 27,184.01
\$ 28,956.23	\$ 57,301.23
\$ 4,100.00	\$ 32,445.00
\$ 24,856.23	\$ 24,856.23
\$ 0	
\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

William R. Foster

Type of Print Name of Treasurer

SIGNATURE OF TREASURER

2 December 1980
Date

For further information, contact:

Federal Election Commission
Toll Free 800-24-9530
Local 202-523-4088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3-80)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 2 for
LINE NUMBER
(Use separate sheet for each
copy of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

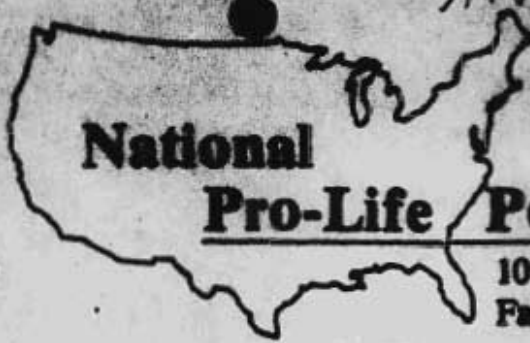
GENERAL AVIATION POLITICAL ACTION COMMITTEE

00014878

	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Paula Hawkins for Senate Crite. Box 12367 Tallahassee, Florida 32308	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			2850
TOTAL This Period (last page (this line number only))			

32040330366

ATTACHED 600 1591
Brown



National Pro-Life Political Action Committee

101 Park Washington Court
Falls Church, VA 22046

(703) 536-7650

Board of Directors

Rev. Charles Farn, O.P.
Chairman

Thomas F. Boser

Morris Shust

Carmen V. Sperman, Esq.

Rev. Harold Presblich

William J. Inneson, Esq.

Rev. William Cogan?

Executive Director

Peter B. Genna, Jr.

Assistant Director

Allen B. Montrow

Advisory Committee

Rev. John W. McCannick?

Former Speaker of House (MA)

Rev. Thomas H. Blodgett

Congressman, 8th Dist. (OH)

Rev. Larry McDonald, M.D.

Congressman, 7th Dist. (GA)

Rev. Harold L. Volkmann

Congressman, 9th Dist. (MO)

Rev. Robert E. Borman

Congressman, 27th Dist. (CA)

Rev. Ben Paul, M.D.

Congressman, 22nd Dist. (TX)

Rev. Harold G.J. Brown

Chairman, Christian

Action Council (IL)

William Billings

President, National Christian

Action Coalition (VA)

Mrs. Randy Engel

President, U.S. Coalition

for Life (PA)

Professor Victor Ransohoff

Northwestern University

Law School (IL)

Rev. Larry Pratt

President, American Society

of Local Officials (VA)

Professor Charles E. Rice

Notre Dame Law School (IN)

Rev. Donald M. Parker

Executive Director, Illinois Right

to Life Committee (IL)

Rev. Louis (Woody) Jenkins

State Representative (LA)

Anthony J. Ludwig

Chairman, Oklahomaans for Life (OK)

Mrs. Alice Hurdle

Former Editor, National Right

to Life News (MN)

Donald T. Madson, M.D.

Physician & Surgeon (OR)

John F. Hildebrand, M.D.

Alternatives to Abortions

International (OH)

Herbert J. Ratner, M.D.

Editor, Child & Family Quarterly (IL)

Francis P. Filice, Ph.D.

Biologist, University of

San Francisco (CA)

John Finn, Jr.

Business Executive (CA)

Titles for identification only

April 21, 1982

HAND DELIVERED

Duane Brown, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1403

Dear Mr. Brown:

We are writing in response to the April 1 letter of Chairman Reiche requesting a statement from us in connection with the above-referenced matter. Our attorney, William J. Olson, spoke with you to be permitted to file a response no later than Wednesday afternoon.

In his letter, Chairman Reiche indicated that the Office of General Counsel would like to resolve this matter informally and we share this desire.

As you know, this matter is based on a complaint that the National Pro-Life Political Action Committee (the Committee) failed to file its FEC reports relating to the Paula Hawkins Senate Campaign with the Secretary of State of Florida, as required by 2U.S.C. §439(a)(2)(B). On March 30, the Commission made a finding that there is reasonable cause to believe that the violation occurred. I apologize for not responding to the Commission's initial letter but we will be prompt to respond to all further correspondence.

The Committee acknowledges that it did not, in fact, file the report as required. The Committee simply did not understand that it had a legal obligation to make a filing in this particular race. The Committee mistakenly believed that Florida law would control the filing of reports and that no such filings with the Florida Secretary of State were necessary.

The Committee has subsequently been informed by counsel that the Committee did have an obligation to file. Accordingly, it has filed with the Secretary of State of Florida all reports required under Section 439(a)(2)(B). A copy is enclosed. The Committee is therefore now in full compliance with this provision. In addition, all personnel at the Committee with responsibility for FEC

82 APR 21 P 3: 06

GENERAL COUNSEL

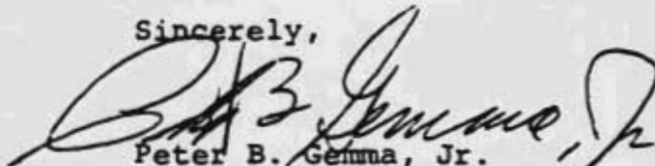
reporting have been thoroughly briefed by the Committee's counsel on all the Committee's filing obligations with the Florida government. The requirements of Section 439 and their relationship to state law have also been explained to the Committee to avoid a recurrence of the type of confusion of state and federal law that occurred in the Hawkins race. The Committee is now current in its obligations under Section 439 in all states.

The Committee recognizes that its violation of the Federal Election Campaign Act is a serious matter and fully appreciates the need to meet its obligations under the Act in the future. It does not believe that these remedial measures vitiate in any way its responsibility for its violation of Section 439 or its obligation to conform to that provision and all other provisions of the Act in the future. The Committee does believe, however, that these remedial measures, together with the other facts in this case, make further action against it unnecessary. Through these measures, the Committee has done what it could do to rectify its violation and to avoid similar violations in the future. At the same time, the fact that it has undertaken these measures provides tangible evidence of its determination to avoid a recurrence and to live up to its obligations under Section 439. There is involved here no willful violation.

We look forward to hearing from you soon and bringing this matter to a prompt conclusion.

I hereby certify that the above information is accurate and complete to the best of my information and belief.

Sincerely,


Peter B. Gemma, Jr.
Treasurer

Enclosure

Subscribed and Sworn to before me in FALLS CHURCH, VA this
21st day of APRIL, 1982.


Notary Public

My commission expires Oct. 25, 1984

32040330369

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

*The National Pro-Life
Political Action Committee*

Address (Number and Street)

101 Park Washington Court

City, State and ZIP Code

Falls Church, Virginia 22046

☐ Check if address is different than previously reported.

2. FEC Identification Number

C 00084483

3. ☐ This committee qualified as a multicandidate com-

mittee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____
(Type CD Election)
election on _____ in the State of _____

☒ Thirtieth day report following the General Election
on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period *10/1/80* Through *11/24/80*

6. (a) Cash on Hand January 1, 19*80*

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

**(d) Subtotal (add lines 6(b) and 6(c) for Column A and
lines 6(a) and 6(c) for Column B)**

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

**9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)**

**10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)**

**Column A
This Period**

**Column B
Calendar Year-to-Date**

\$ 19,964.20

\$ 1,874.22

\$ 32,007.75

\$ 176,687.40

\$ 33,881.97

\$ 196,651.60

\$ 57,298.37

\$ 194,068.00

\$ 2,583.60

\$ 2,583.60

\$

\$ 1,214.98

I certify that I have examined this Report and to the best of my knowledge and belief
it is true, correct and complete.

Peter B. Gemma, Jr.

Type or Print Name of Treasurer

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4068

SIGNATURE OF TREASURER

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.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

32043036

R2 APR 21 P 8:

GENERAL ELECTION

RECEIVED

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Report Covering the Period:

From:

To:

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 32,007.75)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (Use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441old) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

32,007.75

176,687.40

32,007.75

176,687.40

176,687.40

15,329.30

137,897.03

11,311.82

30,811.82

4,632.25

17,823.82

25.00

25.00

31,298.37

186,557.67

32,007.75

176,687.40

32,007.75

176,687.40

15,329.30

137,897.03

15,329.30

137,897.03

32940330379

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 4 of 5 for
LINE NUMBER
(Use separate sheets for each
category of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

The National Pro-Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Andrews for Senate Committee Box 1773 Fargo, ND 58107</i>	<i>campaign contribution</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>B. Paula Hawkins for U.S. Senate Box 12387 Tallahassee, FL 32308</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$500.00</i>
<i>C. East for U.S. Senate Box 26493 Raleigh, NC 27611</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>D. Dreier for Congress 3066 Knollwood Ave. LaVern, CA 91750</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>E. Dornan in '80 Committee P.O. Box 2022 Santa Monica, CA 90406</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$250.00</i>
<i>F. Billington for Congress 2625 North Decatur Rd. Decatur, GA 30030</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>G. Jeffries for Congress Committee P.O. Box 1980 Atchison, KS 66002</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>H. Committee to Re-Elect Albosta P.O. box 2239 Midland, MI 48640</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>I. Committee to Re-Elect Cong. Carney Box 80 Farmingville, NY 11738</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
SUBTOTAL of Disbursements This Page (optional)			<i>\$1,850.00</i>
TOTAL This Period (last page this line number only)			

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

1800 K STREET, NORTHWEST
WASHINGTON, D.C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 462-5400

TELEX
WJG 547M ROGER

DIRECT DIAL NUMBER
223-0066

APR 22 11:04

April 21, 1982

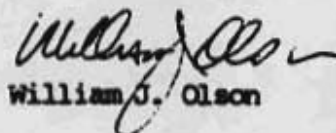
Duane Brown, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: National Pro-Life Political Action Committee

Dear Mr. Brown:

Enclosed is an executed Statement of Designation of Counsel authorizing me to act on behalf of the above-referenced organization before the Federal Election Commission.

Sincerely yours,


William J. Olson

Enclosure

32040330372

STATEMENT OF DESIGNATION OF COUSEL

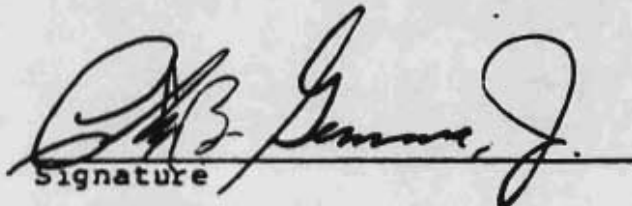
NAME OF COUNSEL: William J. Olson James E. Gates
Smiley, Olson & Gilman
ADDRESS: 1819 H Street, N.W., Suite 500, Washington, D.C. 20006
TELEPHONE: (202) 223-9066

3 2 0 4 0 3 3 0 9 7 3
The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

Date

4/21/82

Signature



Peter B. Gemma, Jr., Treasurer

NAME: National Pro-Life Political Action Committee
ADDRESS: 101 Park Washington Court, Falls Church, Virginia 22046

HOME PHONE: (703) 241-1951

BUSINESS PHONE: (703) 536-7650

ATTACHMENT IV



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600 Security Pacific Plaza
333 South Hope Street
Los Angeles, California 90071

Re: MUR 1403

Dear Mr. Bickett:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. §-439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

82040330374

Attachment V



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. James Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr. Gormley:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

32040330975

ATTACHMENT VI



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

32040330375

ATTACHMENT VII



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Harvill
913 Willow Avenue
Tallahassee, Florida 32303

Dear Mr. Harvill:

3 2 0 4 0 3 3 0 3 7 7

The Federal Election Commission has reviewed the allegations of your complaint dated December 7, 1981 and determined on the basis of the information provided in your complaint to find reason to believe that the Fund for a Conservative Majority, National Right to Life PAC, Americans for Change, National Congressional Club, General Aviation PAC, J.G. Boswell Co. Employees' PAC and National Pro-Life PAC violated 2 U.S.C. § 439(a)(2)(B). However, as each has subsequently filed the appropriate reports with the Florida Secretary of State, the Commission also determined to take no further action in this matter. In addition, the Commission found no reason to believe Life-PAC violated 2 U.S.C. § 439(a)(2)(B) since its activity in the State of Florida was not in connection with the campaign for nomination for election, or election of a candidate to the Office of Senator or Representative in the Congress (See 2 U.S.C. § 439(a)(2)(B)).

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

600-7594

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

800 N STREET, NORTHWEST
WASHINGTON, D.C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 466-5100

TELEX
WU 84174 ROGER

DIRECT DIAL NUMBER
223-2066

APR 22 11:04

April 21, 1982

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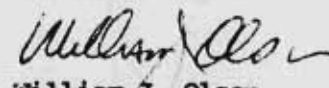
Duane Brown, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: National Pro-Life Political Action Committee

Dear Mr. Brown:

Enclosed is an executed Statement of Designation of Counsel authorizing me to act on behalf of the above-referenced organization before the Federal Election Commission.

Sincerely yours,


William J. Olson

Enclosure

STATEMENT OF DESIGNATION OF COUSEL

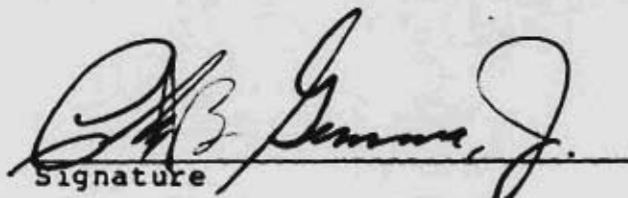
NAME OF COUNSEL: William J. Olson James E. Gates
Smiley, Olson & Gilman
ADDRESS: 1819 H Street, N.W., Suite 500, Washington, D.C. 20006
TELEPHONE: (202) 223-9066

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

32040330879
Date

4/21/82

Signature



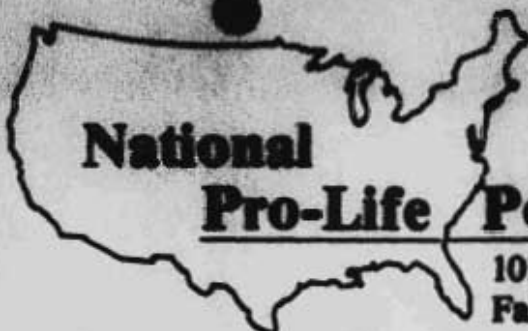
Peter B. Gemma, Jr., Treasurer

NAME: National Pro-Life Political Action Committee
ADDRESS: 101 Park Washington Court, Falls Church, Virginia 22046

HOME PHONE: (703) 241-1951

BUSINESS PHONE: (703) 536-7650

600-7591



National Pro-Life Political Action Committee

Board of Directors
Rev. Charles Flett, O.P.
Chairman

Thomas F. Bower
Morris Shacht

Carmen V. Spurr, Esq.
Hon. Harold Froehlich

William J. Imboden, Esq.
Rev. William Cagin

Executive Director
Peter B. Gorman, Jr.

Assistant Director
Allen B. Minnerow

Advisory Committee
Hon. John W. McCormack

Former Speaker of House (MA)

Hon. Thomas N. Kludum
Congressman, 8th Dist. (OH)

Hon. Larry McDonald, M.D.
Congressman, 7th Dist. (GA)

Hon. Harold L. Vollmer
Congressman, 9th Dist. (MO)

Hon. Robert E. Dornan
Congressman, 27th Dist. (CA)

Hon. Ron Paul, M.D.
Congressman, 12th Dist. (TX)

Rev. Harold O.J. Brown
Chairman, Christian

Action Council (IL)

William Billings
President, National Christian

Action Coalition (VA)

Mrs. Randy Engel
President, U.S. Coalition

for Life (PA)

Professor Victor Boush
Northwestern University

Law School (IL)

Hon. Larry Pratt
President, American Society

of Local Officials (VA)

Professor Charles E. Bos
Notre Dame Law School (IN)

Rev. Donald M. Parker
Executive Director, Illinois Right

to Life Committee (IL)

Hon. Louis (Woody) Johnston
State Representative (LA)

Anthony J. Lusinger
Chairman, Oklahomans for Life (OK)

Mrs. Allen Harts
Former Editor, National Right

to Life News (MD)

Donald T. Manden, M.D.
Physician & Surgeon (OR)

John F. Hoffmann, M.D.
Alternatives to Abortions

International (OH)

Herbert J. Rotter, M.D.
Editor, Child & Family Quarterly (IL)

Francis P. Fles, Ph.D.
Biologist, University of

San Francisco (CA)

John Finn, Jr.
Business Executive (CA)

Titles for identification only

A copy of our report is on file and may be
purchased from the Federal Election Com-

mission, Washington, D.C.

101 Park Washington Court
Falls Church, VA 22046

(703) 536-7650

April 21, 1982

HAND DELIVERED

Duane Brown, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1403

Dear Mr. Brown:

We are writing in response to the April 1 letter of Chairman Reiche requesting a statement from us in connection with the above-referenced matter. Our attorney, William J. Olson, spoke with you to be permitted to file a response no later than Wednesday afternoon.

In his letter, Chairman Reiche indicated that the Office of General Counsel would like to resolve this matter informally and we share this desire.

As you know, this matter is based on a complaint that the National Pro-Life Political Action Committee (the Committee) failed to file its FEC reports relating to the Paula Hawkins Senate Campaign with the Secretary of State of Florida, as required by 2U.S.C. §439(a)(2)(B). On March 30, the Commission made a finding that there is reasonable cause to believe that the violation occurred. I apologize for not responding to the Commission's initial letter but we will be prompt to respond to all further correspondence.

The Committee acknowledges that it did not, in fact, file the report as required. The Committee simply did not understand that it had a legal obligation to make a filing in this particular race. The Committee mistakenly believed that Florida law would control the filing of reports and that no such filings with the Florida Secretary of State were necessary.

The Committee has subsequently been informed by counsel that the Committee did have an obligation to file. Accordingly, it has filed with the Secretary of State of Florida all reports required under Section 439(a)(2)(B). A copy is enclosed. The Committee is therefore now in full compliance with this provision. In addition, all personnel at the Committee with responsibility for FEC

82 APR 21 P 3: 06

Duane Brown, Esq.
April 21, 1982
Page 2

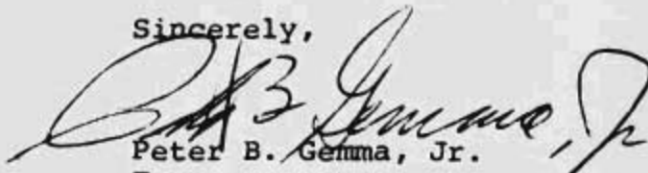
reporting have been thoroughly briefed by the Committee's counsel on all the Committee's filing obligations with the Florida government. The requirements of Section 439 and their relationship to state law have also been explained to the Committee to avoid a recurrence of the type of confusion of state and federal law that occurred in the Hawkins race. The Committee is now current in its obligations under Section 439 in all states.

The Committee recognizes that its violation of the Federal Election Campaign Act is a serious matter and fully appreciates the need to meet its obligations under the Act in the future. It does not believe that these remedial measures vitiate in any way its responsibility for its violation of Section 439 or its obligation to conform to that provision and all other provisions of the Act in the future. The Committee does believe, however, that these remedial measures, together with the other facts in this case, make further action against it unnecessary. Through these measures, the Committee has done what it could do to rectify its violation and to avoid similar violations in the future. At the same time, the fact that it has undertaken these measures provides tangible evidence of its determination to avoid a recurrence and to live up to its obligations under Section 439. There is involved here no willful violation.

We look forward to hearing from you soon and bringing this matter to a prompt conclusion.

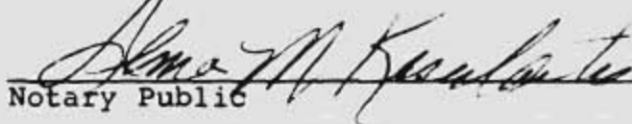
I hereby certify that the above information is accurate and complete to the best of my information and belief.

Sincerely,


Peter B. Gemma, Jr.
Treasurer

Enclosure

Subscribed and Sworn to before me in FALL CHURCH, VA this
21st day of APRIL, 1982.


Notary Public

My commission expires oct. 23, 1984

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

6CC-7591

<p>1. Name of Committee (in Full) <i>The National Tax-Life Political Action Committee</i></p> <p>Address (Number and Street) <i>101 Park Washington Court</i></p> <p>City, State and ZIP Code <i>Falls Church, Virginia 22016</i></p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number <i>C 00084483</i></p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
---	---

82 APR 21 P 8:00
GENERAL ELECTION

3 2 0 0 3 3 0 3 8 2

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <i>10/1/80</i> Through <i>11/21/80</i>		
6. (a) Cash on Hand January 1, 19<i>80</i>		\$ <i>19,964.20</i>
(b) Cash on Hand at Beginning of Reporting Period	\$ <i>1,874.22</i>	
(c) Total Receipts (from Line 1B)	\$ <i>32,007.75</i>	\$ <i>176,687.40</i>
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ <i>33,881.97</i>	\$ <i>196,651.60</i>
7. Total Disbursements (from Line 2B)	\$ <i>1,298.37</i>	\$ <i>194,068.00</i>
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ <i>2,583.60</i>	\$ <i>2,583.60</i>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ <i>1,214.98</i>	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4068

Peter B. Gemma, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

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.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Report Covering the Period:

From:

To:

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 32,007.75)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (Use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441a(d)) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

32,007.75

176,687.40

32,007.75

176,687.40

176,687.40

15,329.30

137,897.03

11,311.82

30,811.82

4,632.25

17,823.82

25.00

25.00

31,298.37

186,557.67

32,007.75

176,687.40

32,007.75

176,687.40

15,329.30

137,897.03

15,329.30

137,897.03

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 4 of 6 for
LINE NUMBER
(Use separate schedule for each
category of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

The National Pro-Life Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Andrews for Senate Committee Box 1773 Fargo, ND 58107</i>	<i>campaign contribution</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>B. Full Name, Mailing Address and ZIP Code Paula Hawkins for U.S. Senate Box 12367 Tallahassee, FL 32308</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$500.00</i>
<i>C. Full Name, Mailing Address and ZIP Code East for U.S. Senate Box 26493 Raleigh, NC 27611</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>D. Full Name, Mailing Address and ZIP Code Dreier for Congress 3086 Knollwood Ave. LaVern, CA 91750</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>E. Full Name, Mailing Address and ZIP Code Dornan in '80 Committee P.O. Box 2022 Santa Monica, CA 90406</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$250.00</i>
<i>F. Full Name, Mailing Address and ZIP Code Billington for Congress 2625 North Decatur Rd. Decatur, GA 30030</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>G. Full Name, Mailing Address and ZIP Code Jeffries for Congress Committee P.O. Box 1980 Atchison, KS 66002</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$100.00</i>
<i>H. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Albosta P.O. Box 2239 Midland, MI 48640</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>
<i>I. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Cong. Carney Box 80 Farmingville, NY 11738</i>	<i>campaign donation</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10/23/80</i>	<i>\$200.00</i>

SUBTOTAL of Disbursements This Page (optional)

\$1,850.00

TOTAL This Period (last page this line number only)

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

1819 H STREET, NORTHWEST

WASHINGTON, D.C. 20006

Diane Brown, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

3 2 0 4 0 3 3 0 9 8 3



National

Pro-Life

Political Action Committee

101 Park Washington Court
Falls Church, VA 22046

Duane Brown, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

9 2 0 4 0 3 3 0 3 8

A Political Action Committee
for Stockholders and Employees
of J. G. Boswell Company

BOSPAC
SUITE 4000, SECURITY PACIFIC PLAZA
338 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

James S. Fisher
Chairman
W. C. Bickett
Treasurer

April 16, 1982

Division of Elections
Department of State
Capitol Building
Tallahassee, FL 32304

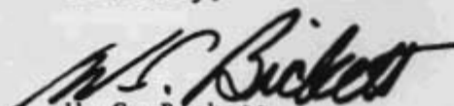
Gentlemen:

In compliance with the Federal Election Campaign Act, 2 U.S.C. 439,
this letter is to advise you of our contribution of \$4,000.00 dated
October 16, 1980 to:

Paula Hawkins for Senate
P. O. Box 12637
Tallahassee, FL 22308

A full report for all contributions is on file with the Federal Election
Commission Washington, D.C. and with the Secretary of State's Office
of the State of California.

Sincerely,


W. C. Bickett
Treasurer

/a

32040330387

A Political Action Committee
for Stockholders and Employees
of J. B. Sewell Company

BOSPAC
SUITE 4800, SECURITY PACIFIC PLAZA
388 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

82 MAY 7 AIO: 13

James B. Fisher
Chairman
W. C. Bickett
Treasurer

32 MAY 7 AIO: 41

May 6, 1982


Mr. Duane Brown
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Brown:

Enclosed is a copy of the report to the Division of Elections for
the State of Florida regarding our contribution to the Paula
Hawkins for Senate Committee.

Further, we have reported our contributions made in the last quarter
of 1981 and the first quarter of 1982 to the respective states.

Sincerely,


W. C. Bickett
Treasurer

enc.

/a

BOSPAC

SUITE 4800, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

Mr. Duane Brown
Federal Election Commission
Washington, D. C. 20463

SEP 17 10:13

28197784
Federal Express

RECEIVED
0cc# 7548
82 APR 15 AIO: 07

GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 19121
WASHINGTON, D.C. 20006

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES D. GORMLEY

Apr 11 13, 1982

82 APR 15 4:02

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

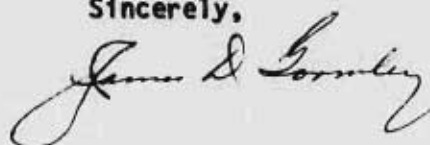
Re: MUR 1403

Dear Chairman Reiche:

I have discussed your letter of April 1, 1982, with Duane A. Brown. Per his counsel, I am forwarding excerpts of the subject report to the Florida Secretary of State, and am herewith forwarding to you a copy of that report.

I trust that you will notify us of any further requirements that might arise.

Sincerely,



Enclosure

32040330890

RECEIVED

82 APR 18 10: 07

GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 10121

WASHINGTON, D.C. 20000

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES S. GORLEY

April 13, 1982

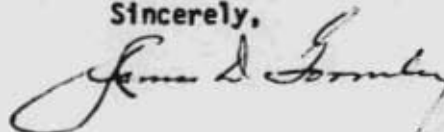
The Honorable George Firestone
Florida Secretary of State
The Capitol
Tallahassee, FL 32304

Dear Sir:

We have been notified by the Federal Election Commission (F.E.C.) of a complaint alleging we failed to file a copy of our Report of Receipts and Disbursements identifying a contribution to the "Paula Hawkins for U. S. Senate Committee" on October 21, 1980.

Enclosed are excerpts from our report to the F.E.C. in November 1980 identifying that contribution.

Sincerely,



Enclosure

3 2 0 4 0 3 3 0 8 9 1

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee
(Summary Page)

82 APR 15 AM 1:01

1. Name of Committee (in Full)
GENERAL AVIATION POLITICAL ACTION COMMITTEE

Address (Number and Street)
P. O. BOX 19121

City, State and ZIP Code
WASHINGTON, D. C. 20036

☐ Check if address is different than previously reported.

2. FEC Identification Number
00014378

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☒ Thirtieth day report following the General Election
on 4 Nov '80 in the State of Federal

☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period 15 October Through 24 Nov. 1980

6. (a) Cash on Hand January 1, 1980

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

Column A This Period	Column B Calendar Year-to-Date
	\$ 30,117.22
\$ 28,956.23	
\$ 0	\$ 27,184.01
\$ 28,956.23	\$ 57,301.23
\$ 4,100.00	\$ 32,445.00
\$ 24,856.23	\$ 24,856.23
\$ 0	
\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

William R. Edgar
Type or Print Name of Treasurer
William R. Edgar
SIGNATURE OF TREASURER

2 December 1980
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.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X-3-80

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 2 for
 LINE NUMBER
 (Use separate schedules for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
GENERAL AVIATION POLITICAL ACTION COMMITTEE		00014878	
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 500
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Paula Hawkins for Senate Cnte. Box 12367 Tallahassee, Florida 32308	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Re-Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 200
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Purpose of Disbursement Election Campaign	Date (month, day, year) 10/17/80	Amount of Each Disbursement This Period 250
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			2850
TOTAL This Period (last page this line number only)			

32040330893

3 2 0 4 0 3 3 0 8 9 4



General Aviation
Manufacturers Association

1700 K Street, N.W.
Washington, D.C. 20006



Federal Election Commission
1326 K Street, N.W.
Washington, D.C. 20006



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1982

Mr. James Bopp, Esquire
900 Sycamore Building
19 South Sixth Street
Terre Haute, Indiana 47807

Re: MUR 1403

Dear Mr. Bopp:

On March 30, 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330895



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. Scott D. Gilbert, Esquire
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1403

Dear Mr. Gilbert:

On March 30, 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330995



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1982

Mr. J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1403

Dear Mr. Herge:

On March 30, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days. For your information, Florida Secretary of state staff informed Commission staff by telephone that your client did not file the appropriate reports related to the Paula Hawkins Senate Campaign until January 18, 1982 and after your client's receipt of the complaint.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330997



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. James D. Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr. Gormley:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March 30, 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

3204033099



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600, Security Pacific Plaza
333 South Hope Street

Re: MUR 1403

Dear Mr. Bickett:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March 30, 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

320403303999



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1982

Mr. Jan W. Baran, Esquire
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1403

Dear Mr. Baran:

On March 30, 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040330900



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

The Federal Election Commission notified you on December 17, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March 30, 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file reports with the Florida Secretary of State pertaining to your committee's contributions to the Paula Hawkins Senate Campaign. You are advised to file the appropriate reports related to the Hawkins Campaign with the Florida Secretary of State.

As of this date, we have received no response from you in connection with this matter. Please submit a response within ten days of your receipt of this letter. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Peter Gannon, Jr.
Page Two

This matter will remain confidential in accordance with
2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify
the Commission in writing that you wish the matter to be made
public.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

Enclosures
Procedures

32040330902



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Life-PAC
310 6th Street, S.E.
Washington, D.C. 20003

Re: MUR 1403

Dear Sir or Madame:

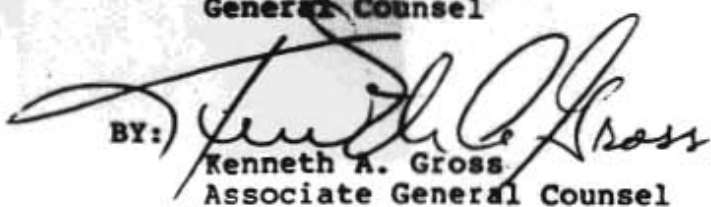
On March 11, 1982, the Commission notified you of a complaint alleging that your committee, had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 30, 1982, determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles W. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

3 2 0 4 0 3 3 0 9 0 1



CERTIFIED MAIL
RETURN RECEIPT

1403

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:
 Life-PAC
 Washington, D.C.

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 943649
 CERTIFIED NO.
 INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE [Signature] Address [] Date []

4. DATE OF DELIVERY
 4-5-82

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASH DC SOUTH WESTERN
 APR 16 1982

☆GPO : 1979-555-555



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Life-PAC
310 6th Street, S.E.
Washington, D.C. 20003

Re: MUR 1403

Dear Sir or Madame:

On March 11, 1982, the Commission notified you of a complaint alleging that your committee, had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March , 1982, determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

A handwritten signature, likely of Kenneth A. Gross, is located at the bottom of the page.

32040330905



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

The Federal Election Commission notified you on December 17, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file reports with the Florida Secretary of State pertaining to your committee's contributions to the Paula Hawkins Senate Campaign. You are advised to file the appropriate reports related to the Hawkins Campaign with the Florida Secretary of State.

As of this date, we have received no response from you in connection with this matter. Please submit a response within ten days of your receipt of this letter. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

32040330906

Peter Senne, Jr.
Page Two

This matter will remain confidential in accordance with
2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify
the Commission in writing that you wish the matter to be made
public.'

Sincerely,

Enclosures
Procedures

87

82040330907



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Jan W. Baran, Esquire
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1403

Dear Mr. Baran: -

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

JAM

82040330909



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600, Security Pacific Plaza
333 South Hope Street

Re: MUR 1403

Dear Mr. Bickett:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,

A handwritten signature, likely of Duane A. Brown, is located at the bottom right of the page.

92040330909



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. James D. Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr. Gormley:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,

A handwritten signature, likely of Duane A. Brown, is located below the "Sincerely," text. The signature is written in dark ink and appears to be a stylized representation of the name.

82040330910



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1403

Dear Mr. Herge:

On March 1, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days. For your information, Florida Secretary of state staff informed Commission staff by telephone that your client did not file the appropriate reports related to the Paula Hawkins Senate Campaign until January 18, 1982 and after your client's receipt of the complaint.

If you have any questions, please direct them to Duane A. Brown at (202) 523-5071.

Sincerely,

BBM

82040330911



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Scott D. Gilbert, Esquire
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1403

Dear Mr. Gilbert:

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

A handwritten signature, likely of Duane A. Brown, is written in ink below the word "Sincerely,". The signature is stylized and appears to be "DAB".

32040330912



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. James Bopp, Esquire
900 Sycamore Building
19 South Sixth Street
Terre Haute, Indiana 47807

Re: MUR 1403

Dear Mr. Bopp:-

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

DBM

82040330913

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Fund for a Conservative Majority,)
et al.)

MUR 1403

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 30, 1982, do hereby certify that the Commission took the following actions in MUR 1403:

1. Decided by a vote of 5-1 to find reason to believe that the Fund for a Conservative Majority, National Right to Life PAC, Americans for Change, and the National Congressional Club violated 2 U.S.C. §439(a)(2)(B), but take no further action and close the file.

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

2. Decided by a vote of 6-0 to find reason to believe that General Aviation PAC, J. G. Boswell Co. Employees PAC, and National Pro-Life PAC violated 2 U.S.C. §439(a)(2)(B).

3. Decided by a vote of 6-0 to take the following actions:

- a. Find no reason to believe that Life PAC violated 2 U.S.C. §439(a)(2)(B).
- b. Send appropriate letters pursuant to the actions taken this date.

Attest:

3/31/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

32040330914



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. ~~W. [unclear]~~/JODY CUSTER *jc*
DATE: MARCH 24, 1982
SUBJECT: OBJECTION - MUR 1403 First General Counsel's
Report dated 3-22-82; Received in OCS, 3-22-82,
11:16

The above-named document was circulated to the Commission on
March 22, 1982 at 4:00.

Commissioner Harris submitted an objection at 5:15, March 23,
1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, March 30, 1982.

32040330915

March 22, 1982

MEMORANDUM TO: Marjorée W. Emmens
FROM: Phyllis A. Kayson
SUBJECT: MUR 1403

Please have the attached First General Counsel's Report distributed to the Commission on a 48 hour tally basis.

Thank you.

Attachment

cc: Brown

3 2 0 4 0 3 3 0 9 1 6

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

82 MAR 22 AM: 10

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION: 3-22-82

MUR 1403
DATE COMPLAINT RECEIVED
BY OGC: 12/07/81
DATE OF NOTIFICATION TO
RESPONDENT: 12/14/81
STAFF MEMBER: Duane A.
Brown

SENSITIVE

COMPLAINANT'S NAME: Paul Harvill

RESPONDENTS' NAME: Fund for A Conservative Majority
National Right to Life PAC
National Pro-Life PAC
Americans for Change
Congressional Club
General Aviation PAC
J.G. Boswell Co. PAC
Life-PAC

RELEVANT STATUTE: 2 U.S.C. § 439(a)(2)(B);
11 C.F.R. § 108.3

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The complainant alleges that except for Life-PAC the
aforementioned respondents contributed individual sums of money
to the Paula Hawkins Senate Campaign in Florida but failed to
file with the Secretary of State the portion of the report
showing these contributions pursuant to 2 U.S.C. § 439(a)(2)(B)
and 11 C.F.R. § 108.3. This provision requires all persons
making expenditures to file "statements and reports in connection

32040330917

with the campaign for nomination for election, or election, of a candidate to the office of Senator in ... the state in which the candidate seeks election."

FACTUAL AND LEGAL ANALYSIS

A) Failure to file with the Florida Secretary of State

Each respondent has replied to the Commission's letter of notification except National Pro-Life PAC. Fund for a Conservative Majority ("FCM"), indicated in its reply letter that it had no explanation why the complainant could not locate copies of the appropriate reports since it was the committee's "practice" to file such. This statement is supported by a signed affidavit from the committee's treasurer, Kenneth Boehm, who swears that he filed the reports at issue with the Florida Secretary of State at the appropriate time. However, a telephone conversation between Commission staff and Florida Secretary of State staff revealed that the reports at issue were not filed by FCM until January 18, 1982 and not until after FCM had received notification of the complaint. Each of the other respondents expressed a general claim of neglect or oversight in their failure to file the appropriate reports with the Florida Secretary of State. All of these respondents, except for General Aviation PAC and J.G. Boswell Company Employees' PAC, have filed the appropriate reports with the Florida Secretary of State. Members of the Commission staff have also determined that the

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contributions by each respondent to the Hawkins campaign were reported to the Commission.

B) Failure to file by Life PAC

8 2 0 4 0 3 3 0 9 1 9
The complainant appears to inquire as to whether respondent, Life-PAC, violated any provision of the Act. He states that although Life-PAC is unrelated to the Hawkins campaign it did give \$500 to a Florida Right to Life Committee. Neither Life-PAC nor Florida Right to Life Committee is registered with the Commission. It appears that complainant is asking whether Life-PAC should also have filed a report with the Secretary of State in Florida. 2 U.S.C. § 439 requires reports to be filed by any person under this Act with the Secretary of State of the appropriate state in which there is a connection with the campaign for nomination for election, or election, of a candidate to the Office of Senator or Representative in the Congress. Since this is not the factual situation provided by the complaint, there appears to be no violation of the Act by Life-PAC.

CONCLUSION

The Office of General Counsel recommends that the Commission find reason to believe that a violation of 2 U.S.C.

§ 439(a)(2)(B) has occurred but take no further action against those respondents which have filed the appropriate report with the Florida Secretary of State since substantial compliance has been achieved. Each respondent who has not filed the appropriate reports with the Florida Secretary of State will be advised to do

so in the General Counsel's proposed letters. The Office of General Counsel recommends that the Commission find no reason to believe that Life PAC violated the Act.

RECOMMENDATIONS

1. Find reason to believe that Fund for a Conservative Majority, National Right to Life PAC, Americans for Change, National Congressional Club, General Aviation PAC, J.G. Boswell Co. Employees' PAC and National Pro-Life PAC violated 2 U.S.C. § 439(a)(2)(B).

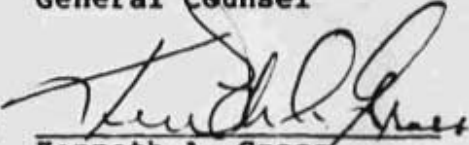
2. Take no further action and close the file as to the Fund for a Conservative Majority, National Right to Life PAC, Americans for Change, and the National Congressional Club.

3. Find no reason to believe that Life PAC violated 2 U.S.C. § 439(a)(2)(B).

4. Approve proposed letters.

March 19, 1982
Date

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Complaint
2. Congressional Club Reply (2 pages)
3. GENAVPAC Reply (2 pages)
4. Americans for Change Reply (8 pages)
5. J.G. Boswell Co. Employees' PAC Reply (2 pages)
6. Fund for a Conservative Majority Reply (3 pages)
7. National Right to Life PAC Reply (1 page)
8. Proposed Letters (8)

82040330920

December 3, 1987

Dear Persons,

According to the Paula Hawkins for US Senate campaign reports filed with the Secretary of State of Florida, the following political action committees contributed to the Hawkins campaign, but did not abide by the United States Code, Title 2, chapter 14, subchapter I, section 439, wherein the appropriate sections of their reports are to be sent to the Secretary of State of Florida. This is a complaint against each PAC for violating this part of the law.

1) Fund for a Conservative Majority

10.3.80 \$1500 to Paula Hawkins

9.3.80 \$2500 to Paula Hawkins

10.30.80 \$200 to Gerald Rehm (state senate)

and others on 8.18, 11.3, 10.27, 8.26, totalling over \$9,000

2) National Right to Life PAC

10.20.80 \$1000 to Paula Hawkins

10.27.80 \$2000 to Paula Hawkins

3) National Pro-Life PAC (Falls Church, VA)

11.6.80 \$500 to Paula Hawkins

4) Americans for Change (Alexandria, VA)

11.3.80 \$1000 to Paula Hawkins

5) Congressional Club (Raleigh, NC)

11.3.80 \$500 to Paula Hawkins

①

- 6.) BOS - PAC (Los Angeles, CA)
10.21.80 \$4000 to Paula Hawkins
- 7.) Genavpac (Washington, DC)
10.21.80 \$250 to Paula Hawkins
- 8.) Life PAC (Washington, DC)
10.20.80 \$500 to Florida Right to Life

This last group is unrelated to Paula Hawkins campaign reports. Florida Right to Life is a state PAC registered with the Secretary of State's Division of Elections. They contribute to state candidates only.

Sincerely,
Paul Harvill

Paul Harvill
913 Willow Av.
Tallahassee, FL 32303

(904) 385-4315

Paul Harvill

Sworn to and subscribed before me this 3rd day of December, 1981.

Patricia Ann Bridger
Notary Public

Notary Public, State of Florida at Large
My Commission Expires Sept. 19, 1984
Bonded by American Fidelity & Guaranty Company

ATTACHMENT II

1101
Brown

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER
(202) 662-5498

TW: 710 625-6000 (CS WSH)
TELE: 66-666 (COVING WSH)
TELEOP: (202) 662-6290
CABLE: COVING

February 5, 1982

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

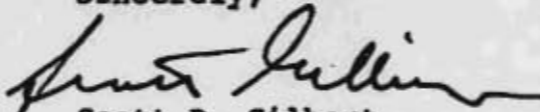
Re: MUR 1403

Dear Mr. Brown:

This is in response to Mr. Gross's letter to our client dated December 14, 1981. Please be advised that as of today, the National Congressional Club has filed with the State of Florida that portion of its FEC report applicable to its contribution to the 1980 Senate campaign of Paula Hawkins. This action was taken in order promptly to resolve this matter, and should not be construed as an admission of liability by the National Congressional Club.

In light of the foregoing, there is no reason for the Commission to take further action on this complaint, and it should be dismissed.

Sincerely,


Scott D. Gilbert

SDG/dg

COFFENS P1:43

RECEIVED
GENERAL COUNSEL

32040330923

(3)

Senator Jesse Helms
Senator John East
Honorary Chairmen



The National
Congressional Club

EXECUTIVE COMMITTEE

Thomas F. Ellis
Chairman

Carter Wrenn
Treasurer

Hugh Chatham
Ed Morris
Marion Parrott
W. T. Joyner, Jr.

January 22, 1982

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

RE: MUR 1403

Gentlemen:

Attached is a Statement of Designation of Counsel.
This is to serve as my letter of representation to
confirm that I would like Mr. Scott Gilbert, of the
firm Covington & Burling of Washington, D. C to
represent the Congressional Club in this matter.

Thank you.

Yours truly,

Carter Wrenn
Treasurer

CW:e

Brown

RECEIVED
JAN 23 1982

GENERAL COUNSEL

32040330924

4 16

Brown
81 DEC 28 AIO: 35
604 5980

GENAVPAC
GENERAL AVIATION POLITICAL ACTION COMMITTEE
P.O. BOX 18181
WASHINGTON, D.C. 20036

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES D. GORNLEY

ATTACHMENT III

December 24, 1981

Federal Election Commission
Washington, D. C. 20463

ATTENTION: Kenneth A. Gross, Associate General Counsel

SUBJECT: MUR 1403

Dear Sir:

This letter is in response to your letter of December 14, 1981, regarding a complaint alleging we failed to comply with existing federal law by not filing a campaign report, with the Secretary of the State of Florida, regarding contributions made to the Paula Hawkins for U. S. Senate campaign committee in 1980. A review of our records reveals the following:

- a. GENAVPAC check #1534 for \$250 payable to "Paula Hawkins for U. S. Senate Committee," dated 17 October 1980.
- b. Copy of our Report of Receipts and Disbursements for the period 15 October 1980 through 24 November 1980, dated 2 December 1980. This report was filed with the F. E. C. and identifies the above disbursement.
- c. There is no record of a report having been filed with the Secretary of State of Florida.

Our review of Title 11, Code of Federal Regulations, Part 104 -- Reports by Political Committees (2 U.S.C. 434) -- Part 108 -- Filing Copies of Reports and Statements with state officers (2 U.S.C. 439), particularly section 108.7 as to Federal preemption -- leads us to believe that no report need be filed with the Secretary of State of Florida.

GENAVPAC officers sought legal advice and applied their own best efforts to obtain, maintain and submit the information required by the ACT for political committees to the persons or offices designated to receive such

DEC 28 P12:26

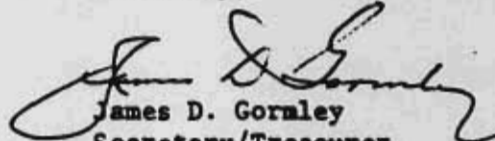
3 2 0 4 3 3 0 9 2 5



Kenneth A. Gross
Federal Election Commission
December 24, 1981
Page two

information. If we have misread the rules and a report is due to the Secretary of State of Florida, it would be appreciated if you would note the particular rules involved so that we may take appropriate steps to immediately comply.

Sincerely,


James D. Gornley
Secretary/Treasurer

820403309226

Requests are of rule 2 order
to file

6

BAKER & HOSTETLER

ATTORNEYS AT LAW

916 CONSTITUTION AVE., N.W.

WASHINGTON, D. C. 20006

(202) 691-1200

TELESCOPE (202) 697-0010

January 5, 1982

IN CLEVELAND, OHIO
3800 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 591-0000
TWX 510 451 5375

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 599-1541

WRITER'S DIRECT DIAL NO.
(202) 691-1572

IN DENVER, COLORADO
500 CAPITAL LIFE CENTER
DENVER, COLORADO 80203
(303) 691-0000

IN ORLANDO, FLORIDA
500 CNA TOWER
ORLANDO, FLORIDA 32801
(305) 541-1111

ATTACHMENT IV

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1403

Dear Mr. Steele:

This office represents Americans For Change ("AFC"). AFC's treasurer, Mr. Roy Pfautch, received a letter from you dated December 14, 1981, regarding a complaint filed with the Federal Election Commission ("FEC") and designated by you as Matter Under Review ("MUR") 1403. Mr. Pfautch has asked us to respond.

The complaint, filed by Mr. Paul Harvill of Tallahassee, Florida, alleges that several political committees including AFC failed to file certain reports with the Secretary of State of Florida pursuant to 2 U.S.C. § 439. Specifically, Mr. Harvill charges that AFC, by virtue of having contributed \$1,000 to Florida Senator Paula Hawkins on November 3, 1980, should have filed relevant portions of its 1980 FEC post-general election report with the Secretary of State.

Upon receipt of your letter, AFC staff checked its files for any record of having sent such a copy of a report to the Secretary of State. No record was found. Accordingly, AFC recently has mailed to Florida officials a copy of that portion

12 JAN 11 P 4:38

RECEIVED

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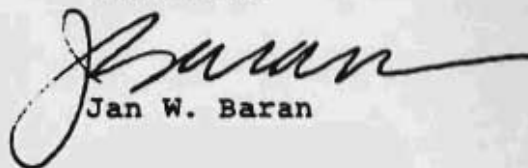
(7)

Charles N. Steele, Esquire
January 5, 1982
Page Two

of the post-general election report relating to the Hawkins contribution, a copy of which is enclosed. AFC has taken this step without verifying records at the Secretary of State.

It is AFC's policy to comply with all reporting obligations. If it failed to file a copy of its report in this instance, such failure was inadvertent and an oversight. Prompt action was taken when this alleged failure was brought to AFC's attention. Precautions are being taken to guard against a reoccurrence. AFC requests that no action be taken by the FEC against it in light of the circumstances and in light that compliance has been achieved.

Sincerely,


Jan W. Baran

JWB:gh
Encl.

cc: Roy Pfautch
Honorable Harrison H. Schmitt

AFC has ^{now} mailed report to Fla.

(8)

32040330928

040330929

P 228 075 811

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Div. of Elections
STREET AND NO.		Dept. of St. Insp. Bldg.
CITY, STATE AND ZIP CODE		Tallahassee, FL 32304
POSTAGE		37
CERTIFIED FEE		75
OPTIONAL SERVICES RETURN RECEIPT SERVICE	SPECIAL DELIVERY	
	RESTRICTED DELIVERY	
	SHOW TO WHOM AND DATE DELIVERED	60
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY	
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	
TOTAL POSTAGE AND FEES		172

PS Form 3800, July 1976

RECEIVED
JAN 1982
USPO

9

Americans for Change

111 So. Columbus Street, Alexandria, Virginia 22314 (703) 683-5221

Executive Committee

Harrison (Jack) Schmitt, Chairman
U.S. Senator, New Mexico

John L. Hanger, Co-Chairman
Former U.S. Governor, California

Dave Dinsberger, Co-Chairman
U.S. Senator, Minnesota

Roy Pfautch, Treasurer
President, Civic Service

Brad O'Leary, Vice-Chairman
Chairman, P/M Creative Productions

January 5, 1982

Division of Elections
Department of State
Capitol Building
Tallahassee, Florida 32304

Dear Sir:

Attached please find the appropriate section
of the Americans for Change, Federal Election
Commission report for the period of 10/16/80
through 11/24/80.

Sincerely,

Yolanda A. Esham

Yolanda A. Esham
Comptroller

(Summary Page)

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☒ Thirtieth day report following the General Election
on Nov. 4 in the State of U.S.
☐ Termination Report

Through 11/24/80

Column A This Period	Column B Calendar Year-to-Date
Through <u>11/24/80</u>	\$ -0-
Reporting Period	\$ 292.27
	\$ 649,404.80
(d) for Column A and	\$ 1,054,361.63
in B/F	\$ 649,697.07
	\$ 1,000.060.42
Period (subtract line 7 from 6(d))	\$ 54,301.21
Committee	\$ -0-
Module D)	\$ 50,982.16

d to the best of my knowledge and belief

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4068

Box 1

incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437a.

FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

11

DETAILED SUMMARY SHEET
of Receipts and Disbursements
(Page 2, FFC FORM 3X)

CHANGE	Report Covering the Period:	
	From: 10/16	To: 11/24/80
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
RECEIPTS		
(a) FROM:		
Political Committees	629,099.45	1,025,473.16
316,618.78	-0-	94.80
	17,650.00	26,019.76
(b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	646,749.45	1,051,587.72
Other than (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)		-0-
OTHER PARTY COMMITTEES		-0-
		-0-
		-0-
EXPENDITURES (Refunds, Rebates, etc.)	2,655.35	2,773.91
MADE TO FEDERAL CANDIDATES		-0-
OTHER		-0-
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	649,404.80	1,054,361.63
DISBURSEMENTS		
	80,392.73	270,096.14
		-0-
OTHER PARTY COMMITTEES		-0-
CANDIDATES AND	21,000.00	21,000.00
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	493,173.13	707,884.28
MADE BY PARTY COMMITTEES		-0-
		-0-
		-0-
	830.00	1,080.00
		-0-
		-0-
	830.00	1,080.00
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)		
	595,395.86	1,000,060.42
NET OPERATING EXPENDITURES		
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	646,749.86	1,051,587.72
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	830.0	1,080.00
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	645,919.45	1,050,507.72
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	80,392.73	270,096.14
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	2,655.35	2,733.91
(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z)	77,737.38	267,322.23

(12)

Summary Page)

100

13

Any information contained in such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from a telephone list.

Name of Committee (in Full)

AMERICANS FOR CHANGE

<p>A. Full Name, Mailing Address and ZIP Code Murkowski For U.S. Senate 524 W. 6th Ave. Anchorage, AK 99501</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code McNary For Senate 7440 Forsyth Blvd. St. Louis, MO 63105</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Nickles For Senate P.O. Box 1549 Ponca City, OK 74601</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Quayle For Senate P.O. Box 216 Indianapolis, IN 46206</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Reelect Bob Packwood Committee P.O. Box 619 Portland, OR 97207</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code Republican Recount Committee 218 N. Lee St. Suite 306 Alexandria, VA 22314</p>	<p>Purpose of Disbursement Contribution To Recount Of Senate Races</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 11/5/80</p>	<p>Amount of Each Disbursement This Period 5,000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code Spector For Senate Western Savings Bank Bldg. #402 Broad & Chestnut St. Philadelphia, PA 19107</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>H. Full Name, Mailing Address and ZIP Code Stewart Ledbetter For Senate P.O. Box 1280 87 Main St. Montpelier, VT 05602</p>	<p>Purpose of Disbursement Contribution</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year) 10/31/80</p>	<p>Amount of Each Disbursement This Period 1,000.00</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>SUBTOTAL of Disbursements This Page (optional)</p>			<p>12,000.00</p>
<p>TOTAL This Period (last page this line number only)</p>			<p>21,000.00</p>

(14)

BOSPAC
SUITE 4000, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

John B. Fisher
Chairman
W. G. Brown
Treasurer

December 30, 1981

ATTACHMENT V

Federal Election Commission
Office of the General Counsel
1324 K Street N.W.
Washington D.C. 20463

Attention: Duane Brown

Re: MUR 1403

Dear Sirs:

We received your notice of a complaint filed against our Political Action Committee yesterday. The complaint arises from not filing with the Secretary of State of the State of Florida a report on the contribution we made to Florida Senator Paula Hawkins.

When our Political Action Committee was formed in 1977, we interpreted the Federal Election Commission Act reporting requirements for a multi-candidate committee to be to the Federal Election Commission and the Secretary of State of the State that the Political Action Committee was organized (in our case, California). Since inception we have filed a complete report with the Federal Election Commission and the California Secretary of State.

Our interpretation was based on the fact that our contributions were being reported in two places, both available for public review, and that the recipients of our contributions would be filing in their home states and with the Federal Election Commission, also available for public review. This seemingly was effective public disclosure without undue duplication of paperwork.

As a result of the complaint, we have again reviewed the reporting requirements of the Act. I guess our initial interpretation was based on a distinction between a multicandidate committee and an authorized committee that is not in the Act. We agree that we should be filing the appropriate sections of our reports with the Secretary of State of the home state of each candidate we support.

continued on page 2

Commencing with our reports for the period ending December 31, 1982, we will report to each state. We will take whatever further action the Federal Election Committee determines is necessary to rectify our past reporting failures.

We would hope that the Federal Election Commission considers this to be a minor infraction and that we haven't actually deprived the public proper notice of our activities.

Sincerely,

W. C. Bickett
W. C. Bickett
Treasurer

/a

3 2 7 4 0 3 3 0 9 3 6

Unsub en

12476 Brown
66FF 6010
SEDAN & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 551-1000

ATTACHMENT VI

GLENN J. SEDAN, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

December 28, 1981

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 521-1000

TELEX 710-831-0898

CABLE SEDANHERGE

DEC 31 1981 13:01

GENERAL COUNSEL

9 2 0 4 0 3 3 0 9 3 7
Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Duane Brown, Esq.

Re: MUR 1403

Dear Mr. Gross:

We are writing in reply to your letter to Fund for a Conservative Majority, dated December 14, 1981, with which was enclosed a copy of a complaint filed by Paul Harvill, alleging that Fund for a Conservative Majority and other identified respondents violated the provisions of 2 U.S.C. 439. This matter has been numbered MUR 1403.

Enclosed herewith, for your records, is a Statement of Designation of Counsel, signed by the present Treasurer of Fund for a Conservative Majority, designating the undersigned as its counsel in connection with this matter.

Fund for a Conservative Majority can offer no explanation why Mr. Harvill could not locate copies of the relevant reports in the offices of the Secretary of State of the State of Florida. It is the standard practice and procedure of Fund for a Conservative Majority, when filing its monthly reports, to send copies thereof to appropriate State officers as required by 2 U.S.C. 439. This practice and procedure is confirmed in the enclosed affidavit of Mr. Kenneth Boehm, dated December 24, 1981, Mr. Boehm being the Treasurer of Fund for a Conservative Majority in 1980.

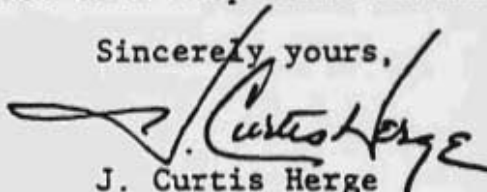
Kenneth A. Gross, Esq.
Page Two
December 28, 1981

Mr. Boehm further states in his affidavit that, consistent with that standard procedure and to the best of his recollection, the reports referred to in Mr. Harvill's complaint were duly mailed to the Department of State of the State of Florida.

All available evidence indicates that Fund for a Conservative Majority met its obligation under 2 U.S.C. 439 and 11 CFR Part 108 by filing with the Department of State of the State of Florida copies of its reports applicable to Federal candidates seeking election in that State. Having filed its reports, Fund for a Conservative Majority cannot be held responsible for the obligations of the Secretary of State as set forth in 2 U.S.C. 439(b).

For the foregoing reasons, Fund for a Conservative Majority should be dismissed as a respondent in this matter.

Sincerely yours,



J. Curtis Herge

Enclosures

*Clear. now filed to each of the files
plus*

(18)

32040330938

AFFIDAVIT
OF
KENNETH BOEHM
MUR 1403

COUNTY OF FAIRFAX
STATE OF VIRGINIA

This day, personally appeared before the undersigned,
a Notary Public in and for the County of Fairfax, State of Virginia
KENNETH BOEHM, who after being duly sworn according to
law, deposed and stated the following in connection with
the complaint filed with the Federal Election Commission,
which has been designated MUR 1403:

1. That at the time the activities referenced
in the subject complaint took place, he was Treasurer of Fund
for a Conservative Majority.

2. That he is acquainted, of his own knowledge,
with the practices and procedures followed by Fund for a
Conservative Majority in 1980 in preparing and filing Federal
Election Commission Report(s) of Receipts and Disbursements
(Form 3X) as required by the Federal Election Campaign Act.

3. That, in 1980, it was the normal and standard
practice and procedure of Fund for a Conservative Majority,
when filing the Federal Election Commission Report(s)
of Receipts and Disbursements, to send copies thereof to
appropriate State officers, as required by 2 U.S.C. 439.

4. That, upon information and belief, copies of
the reports referred to in the subject complaint were duly
mailed to the Department of State of the State of Florida.

Kenneth Boehm (SEAL)
KENNETH BOEHM

Subscribed and sworn to before me this 24th day
of December, 1981.

Donna O. Sisk
Notary Public

My Commission Expires:

May 15, 1984

SEAN A. HENRY
PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 100
4000 WESTVALE DRIVE
FALLS CHURCH, VIRGINIA 22044
703/261-1000

(19)

82040330939

AFFIDAVIT
OF
KENNETH BOEHM
MUR 1403

COUNTY OF FAIRFAX
STATE OF VIRGINIA

This day, personally appeared before the undersigned, a Notary Public in and for the County of Fairfax, State of Virginia, KENNETH BOEHM, who after being duly sworn according to law, deposed and stated the following in connection with the complaint filed with the Federal Election Commission, which has been designated MUR 1403:

1. That at the time the activities referenced in the subject complaint took place, he was Treasurer of Fund for a Conservative Majority.

2. That he is acquainted, of his own knowledge, with the practices and procedures followed by Fund for a Conservative Majority in 1980 in preparing and filing Federal Election Commission Report(s) of Receipts and Disbursements (Form 3X) as required by the Federal Election Campaign Act.

3. That, in 1980, it was the normal and standard practice and procedure of Fund for a Conservative Majority, when filing the Federal Election Commission Report(s) of Receipts and Disbursements, to send copies thereof to appropriate State officers, as required by 2 U.S.C. 439.

4. That, upon information and belief, copies of the reports referred to in the subject complaint were duly mailed to the Department of State of the State of Florida.

Kenneth Boehm (SEAL)
KENNETH BOEHM

Subscribed and sworn to before me this 24th day of December, 1981.

Donna O. Li
Notary Public

My Commission Expires:

May 15, 1984

BRAMES, BOPP & HAYNES
ATTORNEYS AT LAW
222 EVERMORE BUILDING
12 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES
JAMES BOPP, JR.
DAVID B. HAYNES

82 JAN 25 AM 11:33
Brown

TELEPHONE
(317) 238-6421

January 19, 1982

ATTACHMENT VII

JAN 25 P 1:16

GENERAL COUNSEL
RECEIVED

Mr. Duane Brown
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1403

Dear Mr. Brown:

As General Counsel for the National Right to Life Political Action Committee, I have reviewed this matter with various personnel within our organization. It appears that we neglected to file a copy of our Federal Election Report with the appropriate state office in Florida regarding the contributions to the Paula Hawkins for Senate campaign. Please be advised that copies of the appropriate reports have been filed with that office. I have instituted policies to insure that such reports are promptly filed with the appropriate state offices in the future.

If you have any questions regarding this matter, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES

[Signature]

James Bopp, Jr.

JB:maw

Now filed - [unclear]

82040330941



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Jan W. Baran, Esquire
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1403

Dear Mr. Baran: -

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,

32040330942



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1403

Dear Mr. Herge:

On March 4, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days. For your information, Florida Secretary of state staff informed Commission staff by telephone that your client did not file the appropriate reports related to the Paula Hawkins Senate Campaign until January 18, 1982 and after your client's receipt of the complaint.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Scott D. Gilbert, Esquire
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

Re: MUR 1403

Dear Mr. Gilbert:

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202)523-5071.

Sincerely,



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. James D. Gormley
General Aviation PAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr. Gormley:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,

24



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. W. C. Bickett, Treasurer
J.G. Boswell Co. Employees' PAC
Suite 4600, Security Pacific Plaza
333 South Hope Street

Re: MUR 1403

Dear Mr. Bickett:

The Federal Election Commission notified you on December 14, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file the appropriate reports related to your contributions to the Paula Hawkins Campaign with the Florida Secretary of State. You are advised to file these reports with the Florida Secretary of State within 10 days of your receipt of this letter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-5071.

Sincerely,



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

The Federal Election Commission notified you on December 17, 1981, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March , 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Act. Specifically, it appears that you failed to file reports with the Florida Secretary of State pertaining to your committee's contributions to the Paula Hawkins Senate Campaign. You are advised to file the appropriate reports related to the Hawkins Campaign with the Florida Secretary of State.

As of this date, we have received no response from you in connection with this matter. Please submit a response within ten days of your receipt of this letter. Statements should be submitted under oath.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Peter Genna, Jr.
Page Two

This matter will remain confidential in accordance with
2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify
the Commission in writing that you wish the matter to be made
public.

Sincerely,

Enclosures
Procedures

82040330948

(27)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. James Bopp, Esquire
900 Sycamore Building
19 South Sixth Street
Terre Haute, Indiana 47807

Re: MUR 1403

Dear Mr. Bopp:-

On March , 1982, the Commission found reason to believe that your client has violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown, Esquire, at (202) 523-5071.

Sincerely,

32040330949



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Life-PAC
310 6th Street, S.E.
Washington, D.C. 20003

Re: MUR 1403

Dear Sir or Madame:

On March 11, 1982, the Commission notified you of a complaint alleging that your committee, had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March , 1982, determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

29

200628

RECEIVED

Box 7064

22 MAR 2 11:00

LifePAC of Colorado, Inc.
Post Office Box 20536
Denver, CO 80220

February 22, 1982

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

Re: MUR 1403

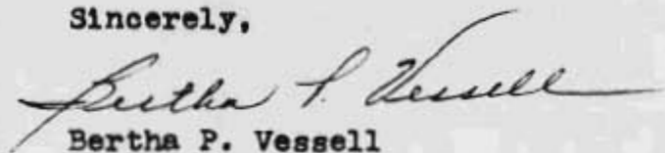
32 MAR 2 13:10

RECEIVED
FEB 23 1982

Dear Mr. Gross:

Pursuant to my telephone conversation, today, with Duane Brown, I am informing the Federal Election Commission that LifePAC of Colorado, Inc. is in no way connected with the complaint filed by Paul Harvill involving contributions to the campaign of Senator Paula Hawkins.

Sincerely,



Bertha P. Vessell
Treasurer

cc: Duane Brown

82040330951

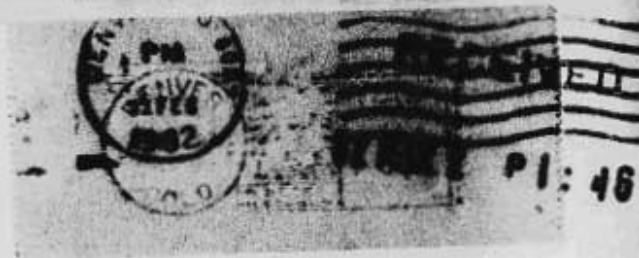
LifePac of Colorado, Inc.
P.O. Box 20536
Denver, CO 80220

RETURN RECEIPT
REQUESTED

CERTIFIED

P25 376029

Mr. Kenneth A. Gross
Associate General Counsel
Federal Elections Commission
1325 K St., NW
Washington, D.C. 20463



20574 RECEIVED
GCC#7242
RECEIVED AM: 08

LifePAC of Colorado, Inc.
Post Office Box 20536
Denver, CO 80220

February 22, 1982

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

32 FEB 25 P 1: 44

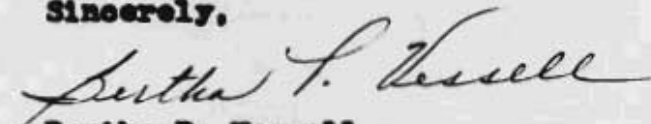
GENERAL COUNSEL

Re: NUR 1403

Dear Mr. Gross:

Pursuant to my telephone conversation, today, with Duane Brown, I am informing the Federal Election Commission that LifePAC of Colorado, Inc. is in no way connected with the complaint filed by Paul Harvill involving contributions to the campaign of Senator Paula Hawkins.

Sincerely,



Bertha P. Vessell
Treasurer

cc: Duane Brown ✓

32040330953

LifePac of Colorado, Inc.
P.O. Box 20536
Denver, CO 80220



RECEIVED

82 FEB 25 11:57

RETURN RECEIPT
REQUESTED

Mr. Duane Brown
Federal Elections Commission
1325 K St., NW
Washington, D. C. 20463

CERTIFIED

P25 3760298

MAIL

4 6 3 3 0 3 5

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-8000

WRITER'S DIRECT DIAL NUMBER
(202) 662-5498

TW: 710 662-8006 (CS WSH)
TELE: 66-562 (COVING WSH)
TELETYPE: (202) 662-6290
CABLE: COVING

February 5, 1982

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

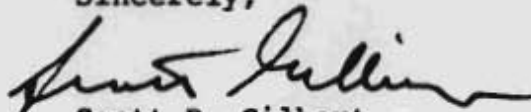
Re: MUR 1403

Dear Mr. Brown:

This is in response to Mr. Gross's letter to our client dated December 14, 1981. Please be advised that as of today, the National Congressional Club has filed with the State of Florida that portion of its FEC report applicable to its contribution to the 1980 Senate campaign of Paula Hawkins. This action was taken in order promptly to resolve this matter, and should not be construed as an admission of liability by the National Congressional Club.

In light of the foregoing, there is no reason for the Commission to take further action on this complaint, and it should be dismissed.

Sincerely,


Scott D. Gilbert

SDG/dg

62 FEB 5 11:43

GENERAL COUNSEL

32040330955

3 2 0 4 0 3 3 0 9 5 6

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

BY HAND

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

61

02 FEB 5 P 1:43

Senator Jesse Helms
Senator John East
Honorary Chairmen



**The National
Congressional Club**

EXECUTIVE COMMITTEE

Thomas F. Ellis
Chairman

Carter Wrenn
Treasurer

Hugh Chatham
Ed Morris
Marion Parrott
W. T. Joyner, Jr.

January 22, 1982

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

RE: MUR 1403

Gentlemen:

Attached is a Statement of Designation of Counsel.
This is to serve as my letter of representation to
confirm that I would like Mr. Scott Gilbert, of the
firm Covington & Burling of Washington, D. C to
represent the Congressional Club in this matter.

Thank you.

Yours truly,

Carter Wrenn
Treasurer

CW:e

82040330957

12 FEB 1 13:23

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STATEMENT OF DESIGNATION OF COUSEL

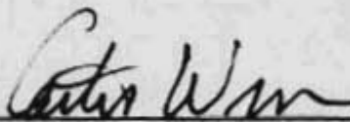
NAME OF COUNSEL: Covington & Burling, c/o Scott Gilbert

ADDRESS: P. O. Box 7566, 1201 Pennsylvania Ave., N.W., Washington, D.C. 20044

TELEPHONE: 202-662-6000

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

1/21/82
Date


Signature

NAME:

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

82040380958

820403300000

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P. O. BOX 7506

WASHINGTON, D.C. 20044

Duane Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

BY HAND

ROBERT L. SASSONE

Case # 6054

Attorney at Law
900 North Broadway
Suite 725
Santa Ana, California 92701
(714) 547-5611

2 JAN 12 PM 12:17

RECEIVED
FEDERAL ELECTIONS COMMISSION

FEDERAL ELECTIONS COMMISSION
Washington, D.C. 20463

Re: Charge against Life Pac in Florida

Gentlemen:

This office represents LAPAC, not Life Pac. On December 16, 1981, LAPAC received a complaint. It appears that we have no relation to the matters complained of because we are not Life Pac, which was the organization named in the complaint. In addition, a quick search of our records has indicated that we did not do the items complained of and we were not involved in any way. Please feel free to contact this office if you need additional information.

Very truly yours,

Robert L. Sassone

ROBERT L. SASSONE

RLS:ts

82040330960

Robert L. Sassone
Attorney at Law
900 North Broadway
Santa Ana, California 92701



FEDERAL ELECTIONS COMMISSION
Washington, D.C. 20463

9 2 0 4 0 3 3 9 6

102658

RECEIVED

CC# 7024

82 JAN 25 All: 33

BRAMES, BOPP & HAYNES
ATTORNEYS AT LAW
800 SYCAMORE BUILDING
19 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES
JAMES BOPP, JR.
DAVID D. HAYNES

TELEPHONE
(812) 238-2421

January 19, 1982

32 JAN 25 P 1:16

Mr. Duane Brown
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1403

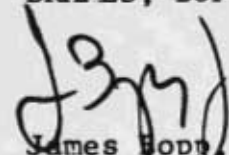
Dear Mr. Brown:

As General Counsel for the National Right to Life Political Action Committee, I have reviewed this matter with various personnel within our organization. It appears that we neglected to file a copy of our Federal Election Report with the appropriate state office in Florida regarding the contributions to the Paula Hawkins for Senate campaign. Please be advised that copies of the appropriate reports have been filed with that office. I have instituted policies to insure that such reports are promptly filed with the appropriate state offices in the future.

If you have any questions regarding this matter, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES



James Bopp, Jr.

JB:maw

32040330962

RECEIVED

BRAMES, BOPP & HAYNES
ATTORNEYS AT LAW
800 SYCAMORE BUILDING
18 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

82 JAN 25 AM: 33

ARNOLD H. BRAMES
JAMES BOPP, JR.
DAVID D. HAYNES

TELEPHONE
(812) 238-2421

January 19, 1982

FOR YOUR INFORMATION

Division of Elections
Department of State
Capitol Building
Tallahassee, FL 32304

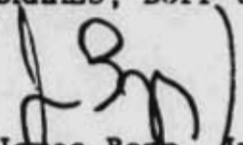
Gentlemen:

As General Counsel for the National Right to Life Political Action Committee, it has been brought to our attention that we inadvertently neglected to file with your office a copy of our Federal Election Report covering the period October 16, 1980, through November 24, 1980, wherein a contribution to the Paula Hawkins for Senate campaign is listed. Please find enclosed a copy of said report.

If you have any questions regarding this matter, please let me know.

Sincerely,

BRAMES, BOPP & HAYNES


James Bopp, Jr.

JB:maw
Enclosure
cc: Duane Brown
Federal Election Commission

32040330963

BRAMES, BOPP & HAYNES

ATTORNEYS AT LAW

800 SYCAMORE BUILDING

18 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807



RECEIVED

82 JAN 25 811

Mr. Duane Brown
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

3 2 9 4 0 3 3 0 6 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 6, 1982

James Bopp, Esquire
900 Sycamore Building
19 South Sixth Street
Terre Haute, Indiana 47807

Re: MUR 1403

Dear Mr. Bopp:

This is to confirm your telephone conversation of December 30 with Duane Brown of my staff in which you were advised that your request for thirty (30) additional days to respond to the Commission's notification was denied. However, this office will permit you to extend the time for responding until January 15, 1981. If the response is not received on or before that date, further action will be taken.

If you have any questions, please feel free to contact Duane Brown, the attorney assigned this matter at (202)523-4057.

Sincerely,

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

Charles N. Steele
General Counsel

32040330965



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James Bopp, Esquire
900 Sycamore Building
19 South Sixth Street
Terre Haute, Indiana 47807

Re: MUR 1403

Dear Mr. Bopp:

This is to confirm your telephone conversation of December 30 with Duane Brown of my staff in which you were advised that your request for thirty (30) additional days to respond to the Commission's notification was denied. However, this office will permit you to extend the time for responding until January 15, 1981. If the response is not received on or before that date, further action will be taken.

If you have any questions, please feel free to contact Duane Brown, the attorney assigned this matter at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

82040330966

BAKER & BOSTETLER

ATTORNEYS AT LAW

515 CONSTITUTION AVE., N.W.

WASHINGTON, D. C. 20006

(202) 681-2200

TELEFAX (202) 681-0010

IN CLEVELAND, OHIO
3800 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 581-0000
TWO 216 481 5375

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 222-1241

IN DENVER, COLORADO
505 CAPITAL LIFE CENTER
DENVER, COLORADO 80203
(303) 691-0000

IN ORLANDO, FLORIDA
550 CNA TOWER
ORLANDO, FLORIDA 32802
(407) 841-1111

January 5, 1982

WRITER'S DIRECT DIAL NO.1

(202) 681-1572

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1403

Dear Mr. Steele:

This office represents Americans For Change ("AFC"). AFC's treasurer, Mr. Roy Pfautch, received a letter from you dated December 14, 1981, regarding a complaint filed with the Federal Election Commission ("FEC") and designated by you as Matter Under Review ("MUR") 1403. Mr. Pfautch has asked us to respond.

The complaint, filed by Mr. Paul Harvill of Tallahassee, Florida, alleges that several political committees including AFC failed to file certain reports with the Secretary of State of Florida pursuant to 2 U.S.C. § 439. Specifically, Mr. Harvill charges that AFC, by virtue of having contributed \$1,000 to Florida Senator Paula Hawkins on November 3, 1980, should have filed relevant portions of its 1980 FEC post-general election report with the Secretary of State.

Upon receipt of your letter, AFC staff checked its files for any record of having sent such a copy of a report to the Secretary of State. No record was found. Accordingly, AFC recently has mailed to Florida officials a copy of that portion

Doc# 6053

2 JAN 11 P 4:38

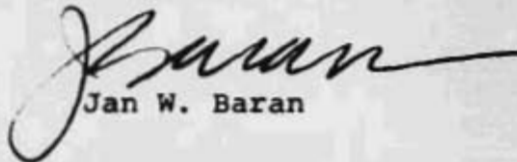
32040330967

Charles N. Steele, Esquire
January 5, 1982
Page Two

of the post-general election report relating to the Hawkins contribution, a copy of which is enclosed. AFC has taken this step without verifying records at the Secretary of State.

It is AFC's policy to comply with all reporting obligations. If it failed to file a copy of its report in this instance, such failure was inadvertent and an oversight. Prompt action was taken when this alleged failure was brought to AFC's attention. Precautions are being taken to guard against a reoccurrence. AFC requests that no action be taken by the FEC against it in light of the circumstances and in light that compliance has been achieved.

Sincerely,


Jan W. Baran

JWB:gh
Encl.

cc: Roy Pfautch
Honorable Harrison H. Schmitt

32040330968

2040330969

P 228 075 811
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	
Div. of Elections	
STREET AND NO.	
Dept. of ST. (pp. B66)	
P.O. STATE AND ZIP CODE	
Tallahassee, FL 32304	
POSTAGE	0.37
CERTIFIED FEE	75.
SPECIAL DELIVERY	
RESTRICTED DELIVERY	
SHOW TO WHOM AND DATE DELIVERED	
60.	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	

PS Form 3824-65-1976



Americans for Change

111 So. Columbus Street, Alexandria, Virginia 22314 (703) 683-5221

Executive Committee

Harrison (Jack) Schmitt, Chairman
U.S. Senator, New Mexico

John L. Warner, Co-Chairman
Former Lt. Governor, California

Dave Durenberger, Co-Chairman
U.S. Senator, Minnesota

Roy Plutch, Treasurer
President, Civic Service

Brad O'Leary, Vice-Chairman
Chairman, P/M Creative Productions

January 5, 1982

Division of Elections
Department of State
Capitol Building
Tallahassee, Florida 32304

Dear Sir:

Attached please find the appropriate section
of the Americans for Change, Federal Election
Commission report for the period of 10/16/80
through 11/24/80.

Sincerely,

Yolanda A. Esham

Yolanda A. Esham
Comptroller

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

AMERICANS FOR CHANGE

Address (Number and Street)

218 N. Lee St.

City, State and ZIP Code

Alexandria, VA 22314

☐ Check if address is different than previously reported.

2. FEC Identification Number

C99002529

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☒ Thirtieth day report following the General Election
on Nov. 4 in the State of U.S.

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 10/16/80 Through 11/24/80

6. (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and
lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

**Column A
This Period**

**Column B
Calendar Year-to-Date**

\$ -0-

\$ 292.27

\$ 649,404.80 \$1,054,361.63

\$ 649,697.07 \$1,054,361.63

\$ 595,395.86 \$1,000,060.42

\$ 54,301.21 \$ 54,301.21

\$ -0-

\$ 50,982.16

I certify that I have examined this Report and to the best of my knowledge and belief
it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4088

Signature of Treasurer

Carl T. Curtis

SIGNATURE OF TREASURER

12-3-80

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.

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

82040330971

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

AMERICANS FOR CHANGE

Report Covering the Period:

From: **10/16** To: **11/24/80**

	COLUMN A Total This Period	COLUMN B Calendar Year to Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	629,099.45	1,025,473.16
Memo Entry Unitemized \$ <u>316,618.78</u>	-0-	94.80
(b) Political Party Committees		
(c) Other Political Committees	17,650.00	26,019.76
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	646,749.45	1,051,587.72
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-
13. ALL LOANS RECEIVED		-0-
14. LOAN REPAYMENTS RECEIVED		-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	2,655.35	2,773.91
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-
17. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	649,404.80	1,054,361.63
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	80,392.73	270,096.14
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		-0-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	21,000.00	21,000.00
22. INDEPENDENT EXPENDITURES (Use Schedule E)	493,173.13	707,884.28
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		-0-
24. LOAN REPAYMENTS MADE		-0-
25. LOANS MADE		-0-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	830.00	1,080.00
(b) Political Party Committees		-0-
(c) Other Political Committees		-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	830.00	1,080.00
27. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	595,395.86	1,000,060.42
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	646,749.86	1,051,587.72
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	830.0	1,080.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	645,919.45	1,050,507.72
32. TOTAL OPERATING EXPENDITURES from Line 19	80,392.73	270,096.14
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	2,655.35	2,733.91
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	77,737.38	267,322.23

02040330972

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 31
Use separate schedule for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMERICANS FOR CHANGE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Buchanan For Senate 1871 South Bellaire Denver, CO 80222	Contribution x Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens For O'Neal 109 North Dearborn Chicago, IL 60602	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends For Jim Abner Box 5004 Sioux Falls, SD 57117	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends Of Al D'Amato 18 E. Sunrise Highway Suite 301 Freeport, NY 11520	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends Of Mack Mattingly P.O. Box 1980 Atlanta, GA 30301	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Goldwater For Senate Committee P.O. Box 39515 Phoenix, AZ 85069	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gorton For Senate 500 Wall Street Seattle, WA 98121	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Grassley For Senate P.O. Box 1000 Des Moines, IA 50306	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Paula Hawkins For Senate P.O. Box 12637 Tallahassee, FL 32308	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/80	1,000.00
SUBTOTAL of Disbursements This Page (optional)			9,000.00
TOTAL This Period (last page this line number only)			

82040330973

Any information supplied from such Reports and State Boards may not be sold or used by any person for the purpose of soliciting contributions for or commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMERICANS FOR CHANGE

A. Full Name, Mailing Address and ZIP Code Murkowski For U.S. Senate 524 W. 6th Ave. Anchorage, AK 99501	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code McNary For Senate 7440 Forsyth Blvd. St. Louis, MO 63105	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Nickles For Senate P.O. Box 1549 Ponca City, OK 74601	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
D. Full Name, Mailing Address and ZIP Code Quayle For Senate P.O. Box 216 Indianapolis, IN 46206	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
E. Full Name, Mailing Address and ZIP Code Reelect Bob Packwood Committee P.O. Box 619 Portland, OR 97207	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
F. Full Name, Mailing Address and ZIP Code Republican Recount Committee 218 N. Lee St. Suite 306 Alexandria, VA 22314	Purpose of Disbursement Contribution To Recount Of Senate Races Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/80	Amount of Each Disbursement This Period 5,000.00
G. Full Name, Mailing Address and ZIP Code Spector For Senate Western Savings Bank Bldg. #402 Broad & Chestnut St. Philadelphia, PA 19107	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
H. Full Name, Mailing Address and ZIP Code Stewart Ledbetter For Senate P.O. Box 1280 87 Main St. Montpelier, VT 05602	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/80	Amount of Each Disbursement This Period 1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			12,000.00
TOTAL This Period (first page this line number only)			21,000.00

82040330974

BAKER & HOSTETLER

518 CONNECTICUT AVE., N. W.

WASHINGTON, D. C. 20006

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20463



3204033075

A Political Action Committee
for Stockholders and Employees
of J. G. Sawell Company

BOSPAC

SUITE 4000, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

James S. Fisher
Chairman
W. C. Elliott
Treasurer

CC# 6035

December 30, 1981

Federal Election Commission
Office of the General Counsel
1324 K Street N.W.
Washington D.C. 20463

Attention: Duane Brown

Re: MUR 1403

Dear Sirs:

We received your notice of a complaint filed against our Political Action Committee yesterday. The complaint arises from not filing with the Secretary of State of the State of Florida a report on the contribution we made to Florida Senator Paula Hawkins.

When our Political Action Committee was formed in 1977, we interpreted the Federal Election Commission Act reporting requirements for a multi-candidate committee to be to the Federal Election Commission and the Secretary of State of the State that the Political Action Committee was organized (in our case, California). Since inception we have filed a complete report with the Federal Election Commission and the California Secretary of State.

Our interpretation was based on the fact that our contributions were being reported in two places, both available for public review, and that the recipients of our contributions would be filing in their home states and with the Federal Election Commission, also available for public review. This seemingly was effective public disclosure without undue duplication of paperwork.

As a result of the complaint, we have again reviewed the reporting requirements of the Act. I guess our initial interpretation was based on a distinction between a multicandidate committee and an authorized committee that is not in the Act. We agree that we should be filing the appropriate sections of our reports with the Secretary of State of the home state of each candidate we support.

continued on page 2

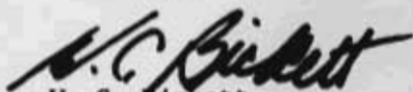
92040330976

2 JAN 5 P2:52

Commencing with our reports for the period ending December 31, 1982, we will report to each state. We will take whatever further action the Federal Election Committee determines is necessary to rectify our past reporting failures.

We would hope that the Federal Election Commission considers this to be a minor infraction and that we haven't actually deprived the public proper notice of our activities.

Sincerely,



W. C. Bickett
Treasurer

/a

82040330977

BOSPAC

SUITE 4800, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

Federal Election Commission
Office of the General Counsel
1324 K Street N. W.
Washington D.C. 20463

Attention: Duane Brown

3 2 0 4 0 3 3 0 9 7 9

10426
6010
SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6200 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT N. SPARKS, JR.
A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

December 28, 1981

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX: 710-831-0898

CABLE: SEDAMHERGE

DEC 31 P 3:01

32040330979
Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Duane Brown, Esq.

Re: MUR 1403

Dear Mr. Gross:

We are writing in reply to your letter to Fund for a Conservative Majority, dated December 14, 1981, with which was enclosed a copy of a complaint filed by Paul Harvill, alleging that Fund for a Conservative Majority and other identified respondents violated the provisions of 2 U.S.C. 439. This matter has been numbered MUR 1403.

Enclosed herewith, for your records, is a Statement of Designation of Counsel, signed by the present Treasurer of Fund for a Conservative Majority, designating the undersigned as its counsel in connection with this matter.

Fund for a Conservative Majority can offer no explanation why Mr. Harvill could not locate copies of the relevant reports in the offices of the Secretary of State of the State of Florida. It is the standard practice and procedure of Fund for a Conservative Majority, when filing its monthly reports, to send copies thereof to appropriate State officers as required by 2 U.S.C. 439. This practice and procedure is confirmed in the enclosed affidavit of Mr. Kenneth Boehm, dated December 24, 1981, Mr. Boehm being the Treasurer of Fund for a Conservative Majority in 1980.

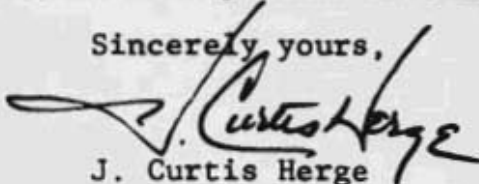
Kenneth A. Gross, Esq.
Page Two
December 28, 1981

Mr. Boehm further states in his affidavit that, consistent with that standard procedure and to the best of his recollection, the reports referred to in Mr. Harvill's complaint were duly mailed to the Department of State of the State of Florida.

All available evidence indicates that Fund for a Conservative Majority met its obligation under 2 U.S.C. 439 and 11 CFR Part 108 by filing with the Department of State of the State of Florida copies of its reports applicable to Federal candidates seeking election in that State. Having filed its reports, Fund for a Conservative Majority cannot be held responsible for the obligations of the Secretary of State as set forth in 2 U.S.C. 439(b).

For the foregoing reasons, Fund for a Conservative Majority should be dismissed as a respondent in this matter.

Sincerely, yours,



J. Curtis Herge

Enclosures

32040330980

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: J. CURTIS HERGE
Sedam & Herge, P.C.
ADDRESS: 8300 Greensboro Drive, Suite 1100
McLean, Virginia 22102
TELEPHONE: (703) 821-1000

RE: MUR 1403

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

FUND FOR A CONSERVATIVE MAJORITY

12/22/81
Date

BY: Robert C. Heckman
Signature ROBERT C. HECKMAN

NAME: ROBERT C. HECKMAN
ADDRESS: 2903 CASHEL LA.
VIENNA, VA. 22180
HOME PHONE: 703 938 1192
BUSINESS PHONE: 703 524 4400

82040330981

AFFIDAVIT
OF
KENNETH BOEHM
MUR 1403

COUNTY OF FAIRFAX
STATE OF VIRGINIA

This day, personally appeared before the undersigned, a Notary Public in and for the ~~County of Fairfax~~, State of Virginia, KENNETH BOEHM, who after being duly sworn according to law, deposed and stated the following in connection with the complaint filed with the Federal Election Commission, which has been designated MUR 1403:

1. That at the time the activities referenced in the subject complaint took place, he was Treasurer of Fund for a Conservative Majority.

2. That he is acquainted, of his own knowledge, with the practices and procedures followed by Fund for a Conservative Majority in 1980 in preparing and filing Federal Election Commission Report(s) of Receipts and Disbursements (Form 3X) as required by the Federal Election Campaign Act.

3. That, in 1980, it was the normal and standard practice and procedure of Fund for a Conservative Majority, when filing the Federal Election Commission Report(s) of Receipts and Disbursements, to send copies thereof to appropriate State officers, as required by 2 U.S.C. 439.

4. That, upon information and belief, copies of the reports referred to in the subject complaint were duly mailed to the Department of State of the State of Florida.

Kenneth Boehm (SEAL)
KENNETH BOEHM

Subscribed and sworn to before me this 24th day of December, 1981.

Danna O. Sisk
Notary Public

My Commission Expires:

May 15, 1984

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102



Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Duane Brown, Esq.

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RECEIVED

81 DEC 28 AM: 35

6a# 5979

BRAMES, BOPP & HAYNES
ATTORNEYS AT LAW
800 SYCAMORE BUILDING
18 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMES
JAMES BOPP, JR.
DAVID D. HAYNES

TELEPHONE
(812) 238-2421

December 18, 1981

Mr. Duane Brown
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1403

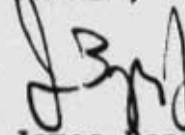
Dear Mr. Brown:

With reference to your letter of December 14, 1981, to Mr. John Stanton, Treasurer, National Right to Life Political Action Committee, regarding the above matter, this is to advise you that I will need an additional thirty (30) days in which to acquire the information necessary to respond to this complaint.

Please let me have your response on this matter.

Sincerely,

BRAMES, BOPP & HAYNES



James Bopp, Jr.

JB:maw

DEC 28 PM 12:25

32040330981

81 DEC 23 AM: 35

STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: James Bopp, Jr.
ADDRESS: BRAMES, BOPP & HAYNES
900 Sycamore Building
Terre Haute, IN 47807
TELEPHONE: 812-238-2421

3 2 0 4 0 3 3 0 9 8 3
The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

Date

Dec 21, 1981

Signature

Philip D. Moran
Philip Moran, Esq.
Treasurer, National Right to Life
Committee, Inc.

NAME: Philip Moran, Esq.

ADDRESS: 49 Federal Street, Salem, MA 01970

HOME PHONE: 617-744-5095

BUSINESS PHONE: 617-745-6085

3 2 0 4 0 3 3 8
BRAMES, BOPP & HAYNES

ATTORNEYS AT LAW

900 SYCAMORE BUILDING

19 SOUTH SIXTH STREET

TERRE HAUTE, INDIANA 47807



RECEIVED

DEC 28

Mr. Duane Brown
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

102440
RECEIVED

81 DEC 28 AM: 35

60045980

GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 19121
WASHINGTON, D.C. 20006

CHAIRMAN
EDWARD W. STIMPSON
SECRETARY-TREASURER
JAMES D. GORNLEY

December 24, 1981

Federal Election Commission
Washington, D. C. 20463

ATTENTION: Kenneth A. Gross, Associate General Counsel

SUBJECT: MUR 1403

Dear Sir:

This letter is in response to your letter of December 14, 1981, regarding a complaint alleging we failed to comply with existing federal law by not filing a campaign report, with the Secretary of the State of Florida, regarding contributions made to the Paula Hawkins for U. S. Senate campaign committee in 1980. A review of our records reveals the following:

- a. GENAVPAC check #1534 for \$250 payable to "Paula Hawkins for U. S. Senate Committee," dated 17 October 1980.
- b. Copy of our Report of Receipts and Disbursements for the period 15 October 1980 through 24 November 1980, dated 2 December 1980. This report was filed with the F. E. C. and identifies the above disbursement.
- c. There is no record of a report having been filed with the Secretary of State of Florida.

Our review of Title 11, Code of Federal Regulations, Part 104 -- Reports by Political Committees (2 U.S.C. 434) -- Part 108 -- Filing Copies of Reports and Statements with state officers (2 U.S.C. 439), particularly section 108.7 as to Federal preemption -- leads us to believe that no report need be filed with the Secretary of State of Florida.

GENAVPAC officers sought legal advice and applied their own best efforts to obtain, maintain and submit the information required by the ACT for political committees to the persons or offices designated to receive such

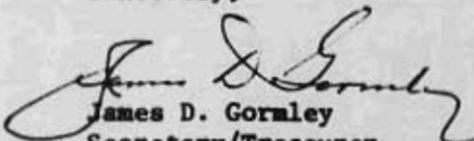
DEC 28 P12:26

32040330987

Kenneth A. Gross
Federal Election Commission
December 24, 1981
Page two

information. If we have misread the rules and a report is due to the Secretary of State of Florida, it would be appreciated if you would note the particular rules involved so that we may take appropriate steps to immediately comply.

Sincerely,


James D. Gornley
Secretary/Treasurer

82040330988

GENAVPAC

GENERAL AVIATION POLITICAL ACTION COMMITTEE

P.O. BOX 18121

WASHINGTON, D.C. 20036

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RECEIVED



AD 35

3 2 0 4 0 3 3 0 8 9

Memo

To: Sacret
From: SAMW
Re: New Found Address - Respondent - MUR 1403
Date: 3/9/82

The following is a newly found address
for a respondent. Please read the complaint
and proper letter to this individual a.s.a.p.
Thank.

Life - PAC
310 6th Street SE
Washington, D.C. 20003

32040330990

Burn file



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Life-PAC
310 - 6th Street, S. E.
Washington, D. C. 20003

Re: MUR 1403

Dear Sir or Madam:

This letter is to notify you that on December 7, 1981, the Federal Election Commission received a complaint which alleged that your committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

You were not previously notified as it was not clear that your committee was a respondent in the complaint nor did we know your address. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

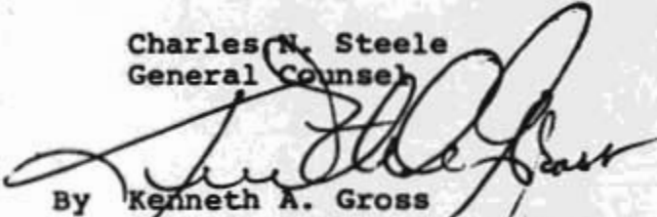
32040330991

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

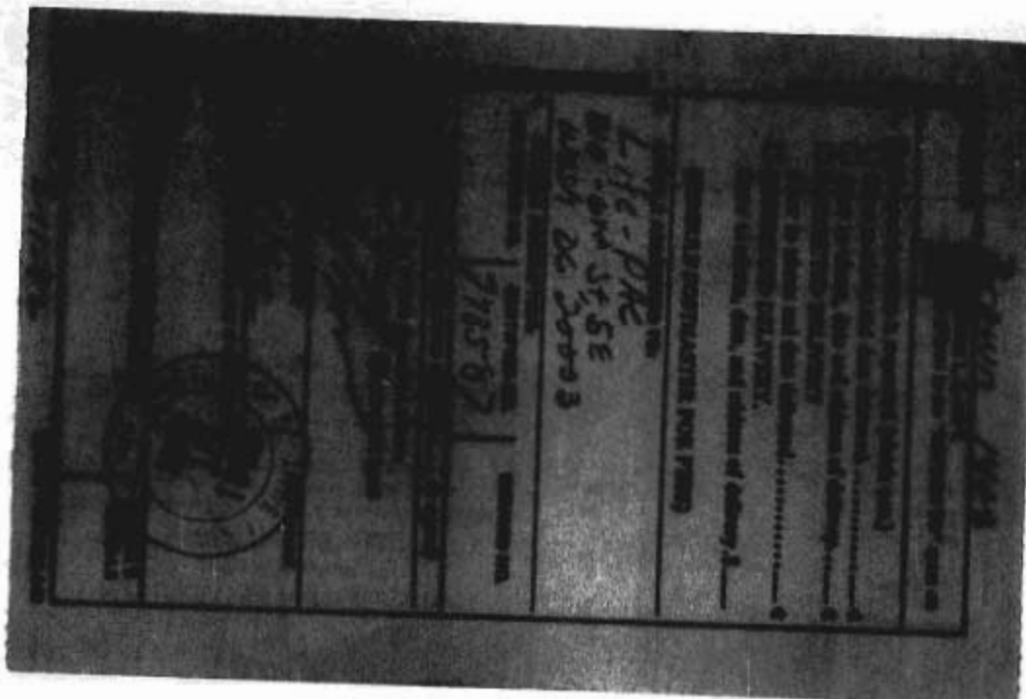
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

82040330992



The image shows a dark, rectangular stamp or form. On the left side, there is a circular seal or logo. The rest of the form contains several lines of text, which are mostly illegible due to the dark image quality. Some visible text includes "Life-PAC" and "NO. 5755". There is also a date "JUN 26 2003" and a number "1785871". The form appears to be a filing or processing stamp.

1-26-82

To: Docket

From: DABrown

Re: MUR 1403 - LIFE PAC Respondent

It appears that an incorrect address was listed for the captioned respondent when the original letters of notification were mailed. The correct address may be found on the attached letter. Please re-mail. Thank!

82040330993



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norman Weslin, Treasurer
LIFE-PAC
P.O. Box 5385
Security, Colorado 80931

Re: MUR 1403

Dear Mr. Brown:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

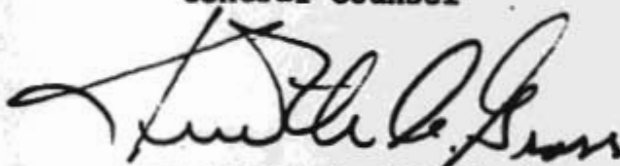
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

3 2 0 4 0 3 3 0 9 9 4

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

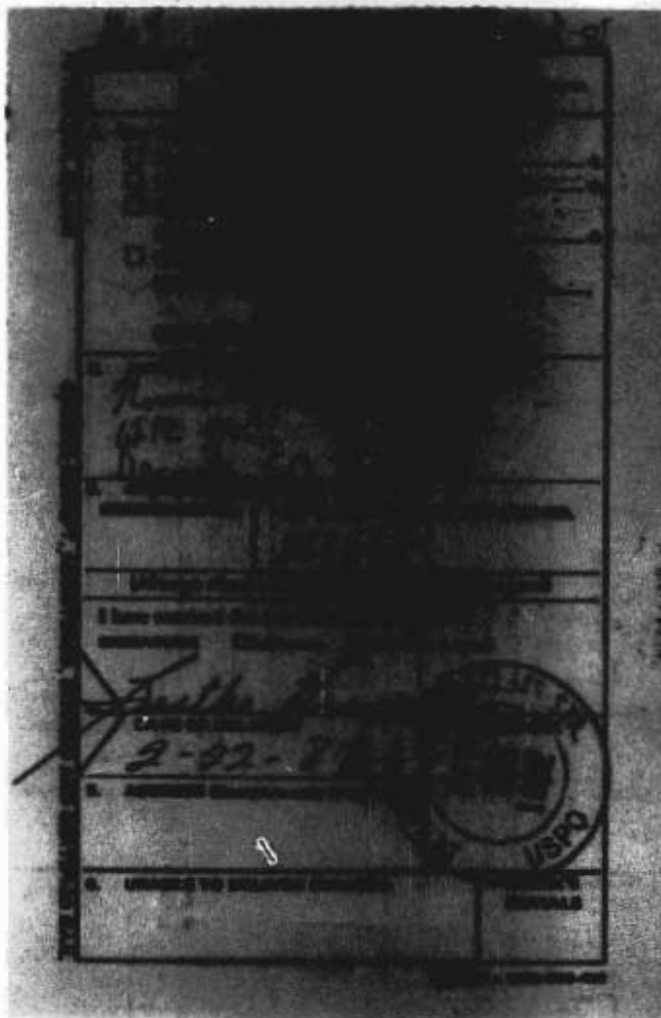
Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



The image shows a dark, heavily shadowed document, likely a complaint or statement, with a circular stamp visible on the right side. The stamp contains the text "U.S. DEPARTMENT OF JUSTICE" and "FEDERAL BUREAU OF INVESTIGATION". The document is oriented vertically and appears to be a form or a set of instructions.

82040330995

MUR # 1463
DATE December 11, 1981

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

1 Fund for a Conservative Majority
1022 Wilson Blvd.
Suite 1401
Arlington, Va. 22209
Kenneth Boehm, Treas.

2 National Right to Life PAC
529 14th Street NW
Suite 341
Washington, D.C. 20045
John Stanton, Treasurer

3 National Pro-Life PAC
101 Park Washington Ct.
Falls Church, Va. 22046
Peter Gemma, Jr., Treas.
Americans for Change
111 S. Columbus
Alexandria, Va. 22314
Roy Pfautch, Treas.

4 Congressional Club
3825 Barrett Drive
P.O. Box 18848
Raleigh, N. Carolina 27619
Carter Wrenn, Treas.

5 BOS-PAC
333 S. Hope St.
Suite 4600
L.A., Calif. 90071

Walter Bickett, Treas.

6 GENAVPAC
P.O. Box 19121
Washington, D.C. 20036
James Gormley, Treas.

7 LIFE-PAC
6 Library Ct. SE
Washington, D.C. 20003
Paul Brown, Treas.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Gormley, Treasurer
GENAVPAC
P.O. Box 19121
Washington, D.C. 20036

Re: MUR 1403

Dear Mr Gormley:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

82040330997

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

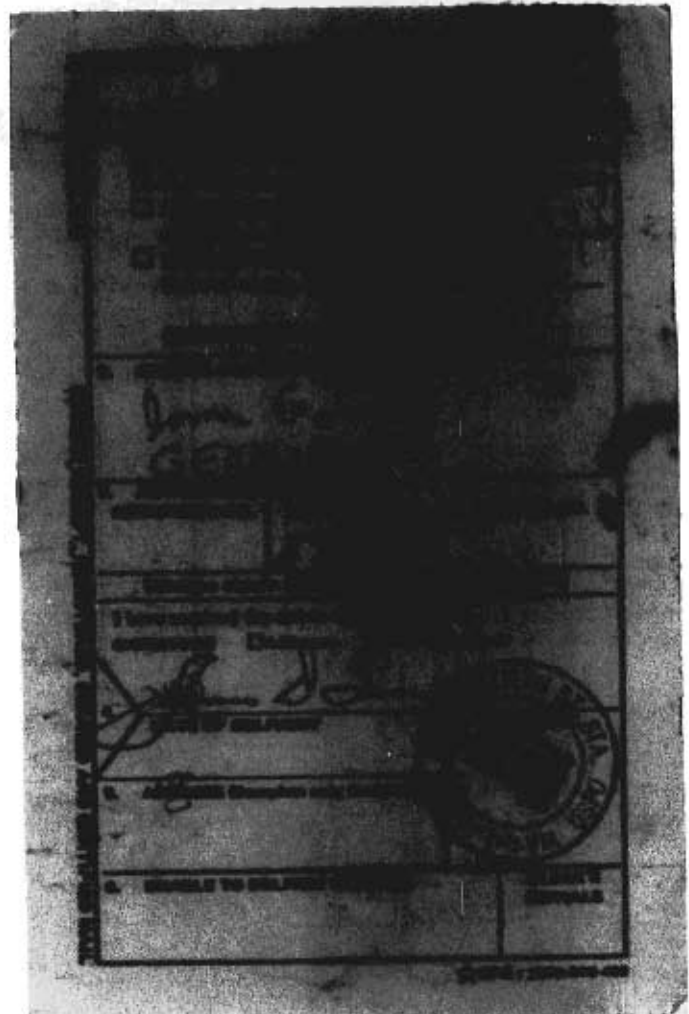
Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



82040330798



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Brown, Treasurer
LIFE-PAC
6 Liberty Court, SE
Washington, D.C. 20003

Re: MUR 1403

Dear Mr. Brown:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

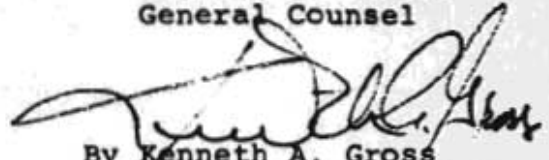
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

92040330999

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

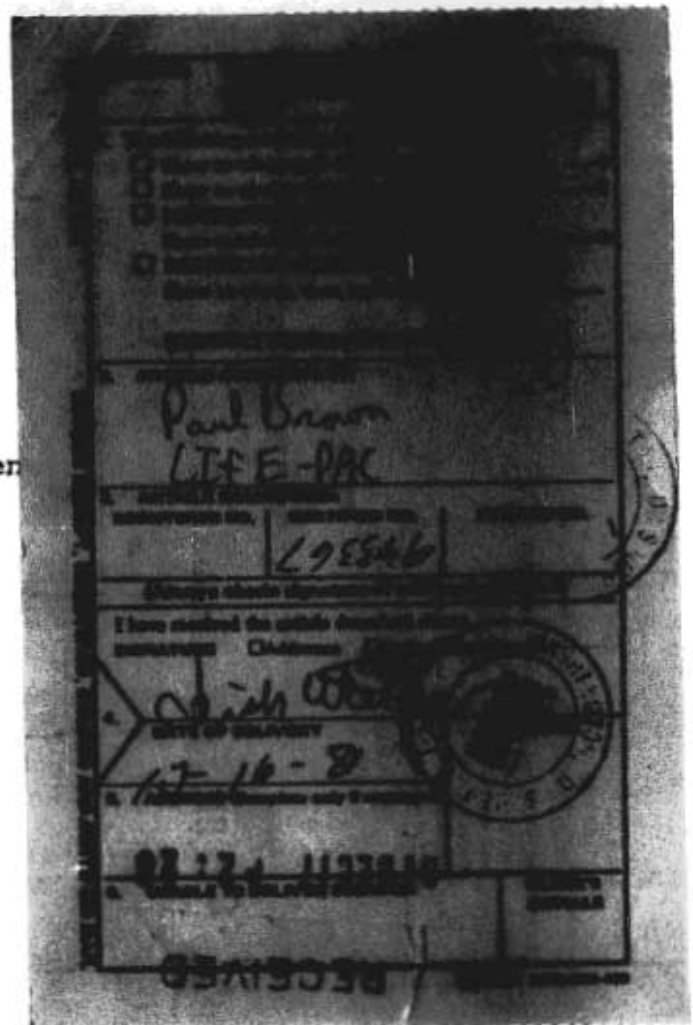


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

8 2 0 4 0 3 3 1 0 0 0



Paul Brown
LIFE-PAC
198546
17-16-8
RECEIVED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Walter Bickett, Treasurer
BOS-PAC
333 South Hope Street, Suite 4600
Los Angeles, CA 90071

Re: MUR 1403

Dear Mr Bickett:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

32040331001

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

7

100-443888-100

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DEC 23 1951

12:08 PM

100-443888-100



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Carter Wrenn, Treasurer
Congressional Club
3825 Barrett Drive
P.O. Box 18848-
Raleigh, North Carolina 27619

Re: MUR 1403

Dear Mr. Wrenn:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

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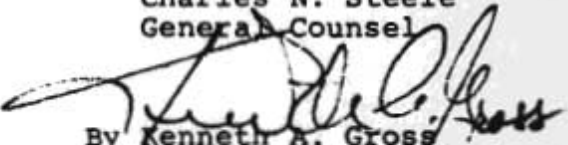
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

82040331003

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

3 2 0 4 0 3 3 1 0 0 4

1. COMPLAINT	
2. PROCEDURES	
3. DESIGNATION OF COUNSEL STATEMENT	
4. SIGNATURE OF CHAIRMAN	
5. DATE OF DELIVERY	
6. ADDRESS OF DELIVERY	
7. NAME OF DELIVERY	



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roy Pfautch, Treasurer
Americans For Change
111 South Columbus
Alexandria, Virginia 22314

Re: MUR 1403

Dear Mr. Pfautch:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

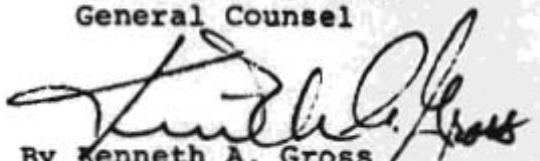
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

92040331005

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

3 2 0 4 0 3 3 1 0 0 5



The stamp contains several fields, some of which are filled with handwritten text. A large, bold, handwritten 'X' is visible in the center. The stamp is oriented vertically and appears to be a standard administrative filing stamp.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Stanton, Treasurer
National Right to Life PAC
529 14th Street, NW
Washington, D.C. 20045

Re: MUR 1403

Dear Mr Stanton:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

82040331007

Sincerely,

General Counsel
Leith L. Gross

By Kenneth A. Gross
Associate General Counsel

1. Complaint
2. Procedures
3. Designation of Council Statement

[illegible]



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kenneth Boehm
Fund for a Conservative Majority
1022 Wilson Blvd., Suite 1401
Arlington, Virginia 22209

Re: MUR 1403

Dear Mr. Boehm:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

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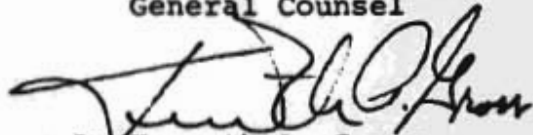
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8204031009

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

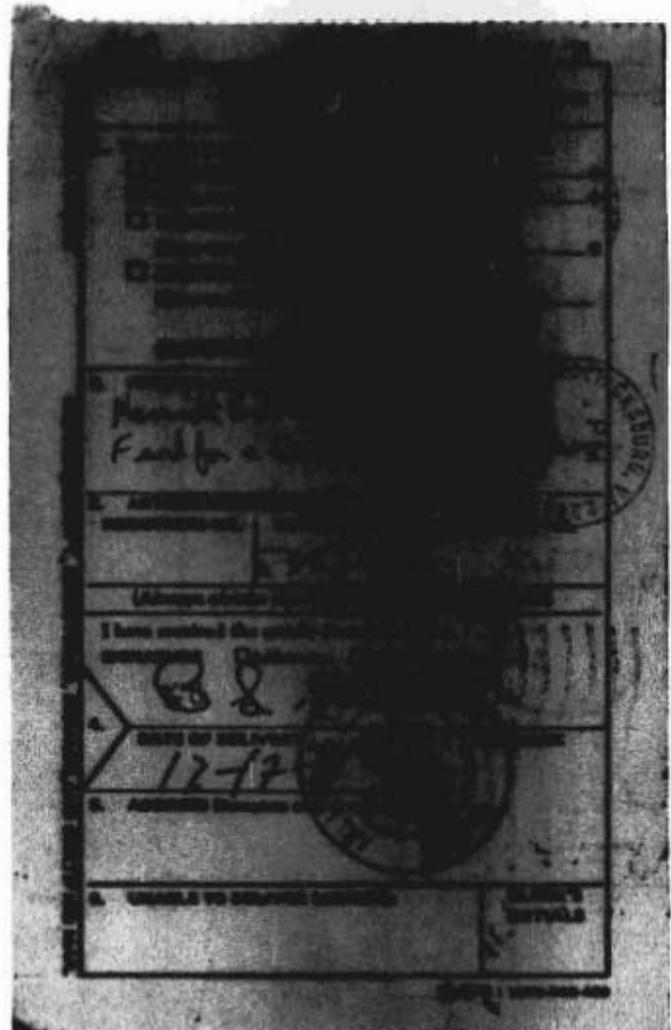


By Kenneth A. Gross
Associate General Counsel

32040331010

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



The document is a dark, rectangular form with a grid-like structure. It contains several sections with headings that are mostly illegible due to the dark scan. There are some handwritten notes and a circular stamp on the right side. The date "12-12-82" is visible in the lower middle section. The form appears to be a record or a receipt of some kind.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Gemma, Jr.
National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

This letter is to notify you that on December 7, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1403. Please refer to this number in all future correspondence.

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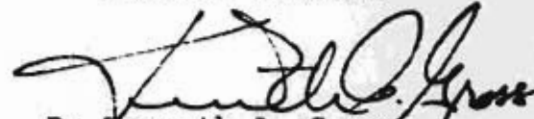
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

3 2 0 4 0 3 3 1 0 1 1

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

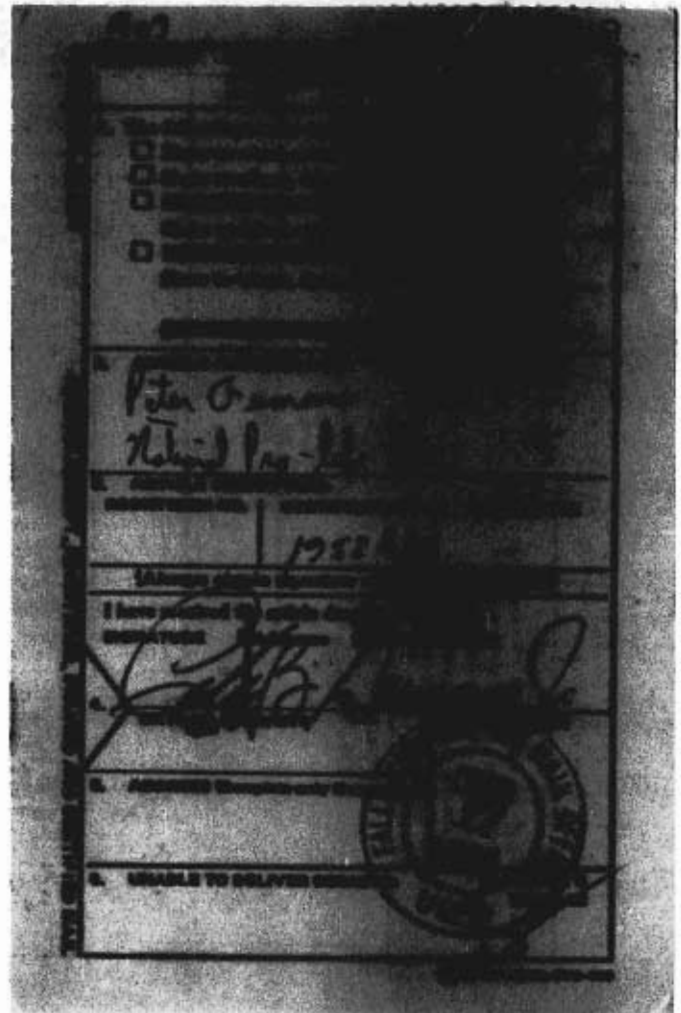
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

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Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



The image shows a dark, high-contrast scan of a document, likely a complaint or statement, with a large circular seal at the bottom right. The document contains several sections with checkboxes and handwritten text. The seal is circular and appears to be an official stamp of the Commission.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Harvill
913 Willow Avenue
Tallahassee, FL 32303

Dear Mr. Harvill:

This letter is to acknowledge receipt of your complaint of December 7, 1981, against Fund for a Conservative Majority, National Right to Life PAC, National Pro-Life PAC, Americans for Change, Congressional Club, BOS-PAC, Genavpac, and the Life PAC which alleges violations of the Federal Elections Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as how this matter should be initially handled will be made 15 days after the respondents' notification.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

T. Garr

T. Garr

2 0 4 0 3 1 0 1 3

2-9-81

1. The following information is requested (check box): <input type="checkbox"/> Name of complainant <input type="checkbox"/> Name of respondent <input type="checkbox"/> Name of witness <input type="checkbox"/> Name of attorney <input type="checkbox"/> Name of other person involved <input type="checkbox"/> Name of other person involved	2. Date of complaint 12-7-81	3. Date of receipt 12-9-81	4. Date of action 12-9-81	5. Date of completion 12-9-81
6. Name of complainant Paul Harvill	7. Name of respondent Fund for a Conservative Majority	8. Name of witness [illegible]	9. Name of attorney [illegible]	10. Name of other person involved [illegible]
11. Name of other person involved [illegible]	12. Name of other person involved [illegible]	13. Name of other person involved [illegible]	14. Name of other person involved [illegible]	15. Name of other person involved [illegible]

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463
DEC 11 1981

Dec 3, 1981

Dear Persons,

According to the Paula Hawkins for U.S. Senate campaign reports filed with the Secretary of State of Florida, the following political action committees contributed to the Hawkins campaign, but did not abide by the United States Code, Title 2, chapter 14, subchapter I, section 439, wherein the appropriate sections of their reports are to be sent to the Secretary of State of Florida. This is a complaint against each PAC for violating this part of the law.

1) Fund for a Conservative Majority

10.3.80 \$1500 to Paula Hawkins

9.3.80 \$2500 to Paula Hawkins

10.30.80 \$200 to Gerald Rehm (state senate)

and others on 8.18, 11.3, 10.27, 8.26, totalling over \$9,000

2) National Right to Life PAC

10.20.80 \$1000 to Paula Hawkins

10.27.80 \$2000 to Paula Hawkins

3) National Pro-Life PAC (Fall Church, VA)

11.6.80 \$500 to Paula Hawkins

4) Americans for Change (Alexandria, VA)

11.3.80 \$1000 to Paula Hawkins

5) Congressional Club (Raleigh, NC)

11.3.80 \$500 to Paula Hawkins

82040331014

- 6) BOS - PAC (Los Angeles, CA)
10.21.80 \$4000 to Paula Hawkins
- 7) Genavpac (Washington, DC)
10.21.80 \$250 to Paula Hawkins
- 8) Life PAC (Washington, DC)
10.20.80 \$500 to Florida Right to Life

This last group is unrelated to Paula Hawkins campaign reports. Florida Right to Life is a state PAC registered with the Secretary of State's Division of Elections. They contribute to state candidates only.

Sincerely,
Paul Harvill

Paul Harvill
913 Willow Av.
Tallahassee, FL 32303

(904) 385-4315

Paul Harvill

Sworn to and subscribed before me this 3rd day of December, 1981.

Patricia Ann Bridger
Notary Public

Notary Public, State of Florida at Large
My Commission Expires Sept. 19, 1984
Bounded By American Fed & County Council

32040331015

Paul Harvill
913 Willow Av.
Ocala, FL 32303

32040331

The General Council
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463





FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1403

Date Filmed 6/3/82 Camera No. --- 2

Camerman SPC



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MR. 1403.

82040331698





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

only the minimum standards for determining must be disclosed.

I trust that you will find the above information to be responsive to your inquiry.

Sincerely,
June 7, 1982

Charles N. Steele
General Counsel

William J. Olson, Esquire
Smiley, Olson and Gilman
1819 H Street, N.W.
Washington, D.C. 20006

Kenneth A. Gross
Associate General Counsel

Dear Mr. Olson:

This is in response to your letter, dated June 1, 1982, to Duane A. Brown of this office.

It is the Commission's position that 2 U.S.C. § 437g(a)(12)(A), the "confidentiality provision" of the Federal Election Campaign Act, applies only to enforcement matters which have not been terminated. In support of this position, see, e.g., 122 Cong. Rec. H. 3779 (daily ed. May 3, 1976) (statement of Rep. Ullman) and 122 Cong. Rec. H. 2533 (daily ed. March 30, 1976) (comment of Rep. Hays).

11 C.F.R. § 111.21(a), the Commission regulation which construes the confidentiality provision, specifically envisions the prohibitions set out therein as applying only to "open" cases. See Explanation and Justification of Regulations Concerning January 8, 1980, Amendments to Federal Election Campaign Act of 1971, 45 Fed. Reg. 15080, 15089 (1980). Significantly, this interpretation of the confidentiality provision has received at least the implicit approval of Congress in that regulations proposed by the Commission are subject to Congressional review and disapproval. See 2 U.S.C. §§ 438(a)(8) and 438(d).

Accordingly, it is the Commission's practice to place on the public record all documents in a closed enforcement matter which would not be exempt from disclosure under the Freedom of Information Act. In this respect, we view 2 U.S.C. § 437g(a)(4)(B)(ii) and 11 C.F.R. § 111.20 as

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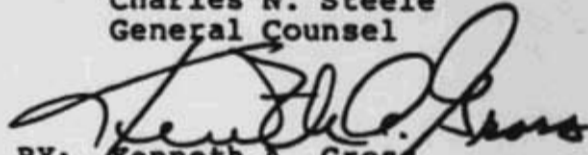
Letter to William J. Olson, Esq.
Page Two

setting forth only the minimum standards for determining
which records which must be disclosed.

I trust that you will find the above information to be
responsive to your inquiry.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

82040331700

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

330 12 STREET, NORTHWEST
WASHINGTON, D.C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 466-5100

TELEX
WU 04174 ROGER

DIRECT DIAL NUMBER

223-9088

June 1, 1982

Duane A. Brown, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

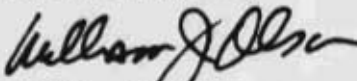
Re: M.U.R. 1403

Dear Mr. Brown:

We are writing on behalf of our client, National Pro-Life Political Action Committee, the respondent in the above-referenced proceeding, in response to a letter from Chairman Reiche dated May 21, 1982. The letter notified us of the Commission's determination to take no further action in the above-referenced matter and to close the file in the matter. We certainly approve of and appreciate this resolution of the matter. The letter also states that the file will be made public within thirty days. It is our understanding that Section 437g(a)(12)(A) of Title 2 of the United States Code and Sections 111.21(a) and (b) of Title 11 of the Code of Federal Regulations expressly prohibit the release to the public of any information relating to this proceeding without the written consent of National Pro-Life Political Action Committee. We would appreciate your informing us if the Commission has a contrary interpretation of the effect of these provisions. Pending your response, we withhold consent for the release of the Commission's file.

We are submitting this letter within the ten-day deadline set forth in Chairman Reiche's letter, pursuant to Section 111.2(a) of Title II of the Code of Federal Regulations. Attached is a copy of a Designation of Counsel.

Sincerely yours,


William J. Olson

Enclosure

82040331701

JUN 2 AIO: 22

GENERAL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

May 21, 1982

Mr. Peter Gemma, Jr.
Treasurer, National Pro-Life PAC
101 Park Washington Court
Falls Church, Virginia 22046

Re: MUR 1403

Dear Mr. Gemma:

On March 30, 1982, the Commission found reason to believe that your committee violated 2 U.S.C. § 439(a)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") 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 its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

82040331702

STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: William J. Olson James E. Gates
Smiley, Olson & Gilman
ADDRESS: 1819 H Street, N.W., Suite 500, Washington, D.C. 20006
TELEPHONE: (202) 223-9066

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

8 2 0 4 0 3 3 1 7 0 3
Date

4/21/82

Signature

Peter B. Genna, Jr., Treasurer

NAME: National Pro-Life Political Action Committee
ADDRESS: 101 Park Washington Court, Falls Church, Virginia 22046

HOME PHONE: (703) 241-1951

BUSINESS PHONE: (703) 536-7650

82040331704
SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

300 H STREET, NORTHWEST

WASHINGTON, D.C. 20006

Duane A. Brown, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1403

82040331705

