



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1581

Date Filmed 2/28/85 Camera No. 1

Cameraman JRL

85040612722

FEDERAL ELECTION COMMISSION

MUR 1581

Routing Cards

12 day reports

Extra Copies of material

ALL Conc./list for material

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

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

Signed

John J. Fitzhead

date

8/6/85

FEC 9-21-77

85040512723

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1581
Californians for an)
Effective Congress)
F. Keenan Behrle, as treasurer)
DNC Services Corporation, et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 11, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1581:

1. Accept the revised conciliation agreements attached to the General Counsel's Report signed January 9, 1985.
2. Approve the letters attached to the General Counsel's Report signed January 9, 1985.
3. Close the file.

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

Attest:

1-14-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

1-9-85, 11:34
1-9-85, 4:00

95040512724



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 15, 1985

Anthony S. Harrington
General Counsel
Jay B. Myerson
Assistant General Counsel
Democratic National Committee
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1581

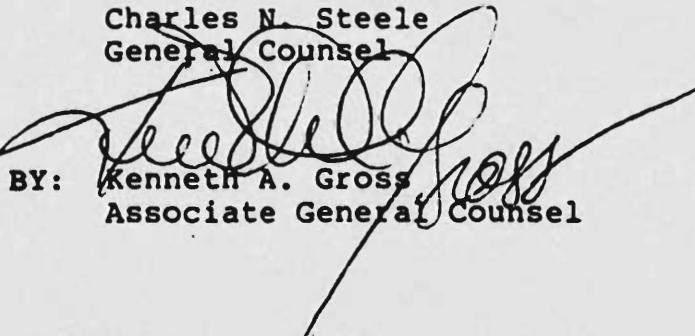
Dear Mr. Harrington:

On January 11, 1985, the Commission accepted the conciliation agreement signed by your clients in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

95040512725

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

DNC Services Corporation)

Paul G. Kirk, Jr., Treasurer)

MUR 1580

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (herein after "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the DNC Services Corporation and its treasurer ("Respondents") violated 2 U.S.C. §441a(f) by accepting an excessive contribution.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this Agreement with the Commission.

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

1. The DNC Services Corporation ("Respondent Committee") is a party committee and registered as such with the Commission.

2. Respondent Committee accepted a \$50,000 contribution from Californians for an Effective Congress ("Contributor Committee") on October 28, 1982. Respondents contend that they believed such funds to be excess campaign funds transferred from the Citizens for McCarthy committee pur-

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suant to 11 C.F.R. §113.2(c). The Contributor Committee previously was known as Citizens for McCarthy and was an exploratory committee for a contemplated campaign for the United States Senate by Leo McCarthy.

3. The Respondent Committee contends that it subsequently learned that the contributor had, prior to making such contribution to the Respondent Committee, become a multicandidate committee under 11 C. F.R. §100.5(e)(3), rather than a single candidate committee under 11 C.F.R. 100.5 (e)(2). As a result of such status, the Contributor Committee was only authorized to make a contribution of up to \$15,000 and was not authorized to transfer unlimited "excess campaign funds." After becoming aware of the foregoing, the DNC refunded to the Contributor Committee the amount of \$35,000.

4. The acceptance of the above contribution exceeded the limitations set forth in 2 U.S.C. §441a by \$35,000.

5. Respondent Paul G. Kirk has been named only in his official capacity as Treasurer. Respondent Kirk was not the Respondent's Treasurer at the time of the transfer and did not participate in any way in the transfer.

V. The Respondent's acceptance of the excessive contribution is a violation of 2 U.S.C. §441a(f).

VI. Respondents contend that they desire to resolve this matter without further proceedings and costly litigation and therefore the Respondents agree to enter into this Conciliation Agreement.

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the aggregate amount of Two Thousand Dollars (\$2,000), pursuant to 2 U.S.C. §437g(a)(5)(A).

VIII. Respondents agree that they will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended ("FECA").

IX. Respondents contend that neither of them have knowingly or willfully violated any provisions of the FECA. This Conciliation Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matters at issue herein.

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

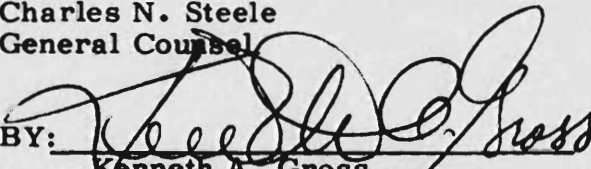
XI. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

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

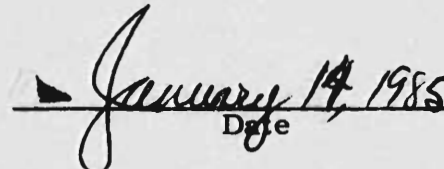
XIII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

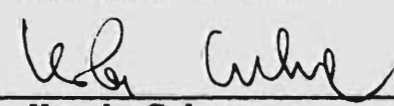
Charles N. Steele
General Counsel

BY: 

Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:

BY: 

Ursula Culver
Comptroller

January 4, 1985
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1985

David M. Ifshin, Esquire
Californians for an Effective
Congress
Mannett, Phelps, Rothenberg and Tunney
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036-6699

RE: MUR 1581

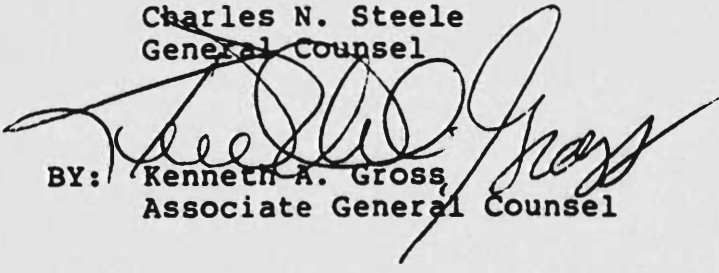
Dear Mr. Ifshin:

On January 11, 1985, the Commission accepted the conciliation agreement signed by your clients in settlement of a violation of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040512729

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)
)
 Californians for an) MUR 1581
 Effective Congress)
 F. Keenan Behrle, Treasurer)

CONCILIATION AGREEMENT

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This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that Californians for an Effective Congress ("Respondent") violated 2 U.S.C. § 441a by making an excessive contribution to the DNC Services Corporation. F. Keenan Behrle has been named in this matter solely in his official capacity as the treasurer of the Respondent.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(1)(4)(A)(i) do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.

85040512731

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

1. Respondent is a registered multicandidate committee.
2. Respondent, on October 19, 1982, contributed \$50,000 to the DNC Services Corporation.
3. Respondent's contribution exceeded the limitations set forth in § 441a by \$35,000.

V. Respondent's contribution of \$50,000 is a violation of 2 U.S.C. § 441a.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of \$2000, pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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

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

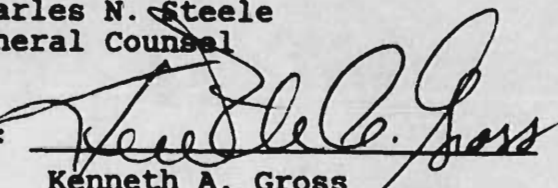
X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

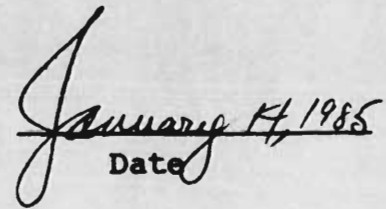
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

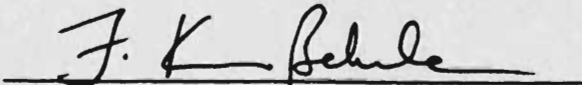
Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:



F. Keenan Behrle, for
Californians for an Effective Congress

January 3, 1985

Date



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: January 9, 1985
SUBJECT: MUR 1581 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

85040512733

Sented 1/7/85*

GCC# 6267

MEMORANDUM

TO: CHERYL THOMAS

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 15535 (a copy of which is attached) RELATING

TO MUR 1581 AND NAME DNC Services Corporation
Paul G. Kink, Jr., Pres.

WAS RECEIVED ON January 7, 1985. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

☒ BUDGET CLEARING ACCOUNT (#95F3875.16)

☐ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

☐ OTHER _____

SIGNATURE Cheryl L. Thomas DATE 1-7-85

D.N.C. SERVICES CORPORATION

GENERAL FUND

1625 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

DC National
Bank ***

UNITED STATES NATIONAL BANK
UCL. 31 Dec 84
1000 14th St. N.W.
Washington, D.C. 20004

15535

Dec. 31 19 84

11-122
148

PAY \$2000.00

PAY _____ DOLLARS \$ 2,000.00

Treasurer of the United States
Washington, D.C.



W. L. C. C. C.

⑈00015535⑈ ⑈054001204⑈

⑈262880 5⑈



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: TOM WHITEHEAD

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1581: DNC SERVICES CORPORATION/DNC (DNC)

Please review the attached Request for Additional Information which is to be sent to the DNC for the 1984 New and Amended September Monthly Reports. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

Attachment

85040512736



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Paul G. Kirk Jr., Treasurer
DNC Service Corporation/
Democratic National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: September Monthly Report (8/1/84-8/31/84) and
September Monthly Amendment Report dated 10/17/84

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 19 and 23, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B Totals.

-The total amount of contributions itemized on Schedule A, plus the total amount of unitemized contributions reported on the Detailed Summary Page, should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. 11 CFR 104.3(a).

In reference to your Amended September Monthly Report (10/17/84):

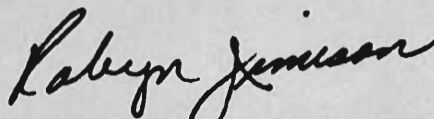
-Schedule F of your report discloses a transfer of \$10,000 to the North Carolina Democratic Party. Please clarify the purpose of this transfer.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040512737

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Robyn Jameson
Reports Analyst
Reports Analysis Division

85040312738

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1581
Californians for an)
Effective Congress)
F. Keenan Behrle, Treasurer)
DNC Services Corporation, et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 14, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1581:

1. Enter into conciliation with respondents prior to a finding of probable cause.
2. Approve the proposed conciliation agreements submitted with the General Counsel's Report signed August 9, 1984.
3. Approve and send the letters attached to the General Counsel's Report signed August 9, 1984.

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

Attest:

8-14-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 8- 9-84, 2:37
Circulated on 48 hour tally basis: 8-10-84, 2:00

85040512739



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN M. TEIR *SMT*

DATE: AUGUST 13, 1984

SUBJECT: COMMENTS RE: MUR 1581 - GENERAL COUNSEL'S
REPORT signed August 9, 1984

Attached is a copy of Commissioner Reiche's
vote sheet with comments regarding the above-captioned
matter.

Attachment:
copy of vote sheet

85040512740



RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

84 AUG 13 P 1:30

Date and Time Transmitted: 8/10/84 AT 2:00 P.M.

COMMISSIONER: McGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY 8/14/84 AT 2:00 P.M.

SUBJECT: MUR 1581 General Counsel's Report signed on August 9, 1984

- 8
5
0
4
0
5
1
2
7
4
1
- (☒) I approve the recommendation
() I object to the recommendation

Date: 8/10/84

Signature: Frank V. Weiske

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: August 9, 1984
SUBJECT: MUR 1581 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐
24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐
Information ☐
Sensitive ☐
Non-Sensitive ☐
Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐
Litigation ☐
Closed MUR Letters ☐
Status Sheets ☐
Advisory Opinions ☐
Other (see distribution below) ☐

85040512742

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
Californians for an)
Effective Congress, and)
F. Keenan Behrle, as treasurer,)
DNC Services Corporation, et al.)

84 AUG 9 P2:37

MUR 1581

GENERAL COUNSEL' REPORT

SENSITIVE

I. BACKGROUND

This matter was generated as a result of a referral from the Reports Analysis Division.

On October 3, 1983, the Commission found reason to believe that Californians for an Effective Congress ("CEC") and F. Keenan Behrle as treasurer violated 2 U.S.C. § 441a, and DNC Services Corporation and Ursula Culver as treasurer violated 2 U.S.C. § 441a(f). Both respondents were sent briefs recommending probable cause be found on December 20, 1983.1/

1/It should be noted that in each brief, an erroneous reference is made, i.e. that the "McCarthy Committee was an exploratory Committee directed toward testing the waters" of former Senator McCarthy's candidacy. The exploratory Committee was that of Mr. Leo McCarthy, the present Lieutenant Governor of California. It is the intention of this Office to correct this error on the public record.

85040512743

II. LEGAL ANALYSIS

(See OGC Brief of December 20, 1983).

III. DISCUSSION OF CONCILIATION PROVISIONS

AND OTHER DEWAT.TV

85040512744
According to respondent's counsel, the violation in this matter resulted from a misinterpretation by legal counsel as to the status of a candidate committee's funds when the candidate committee converts to a political committee. On or about October 11, 1982, Michael Gage, campaign manager for the McCarthy for Lieutenant Governor Committee at the time of the transaction, in a telephone conversation with Michael F. Steed, counsel to the Chairman of the Democratic National Committee, inquired if the McCarthy For Senate Committee could transfer funds of approximately \$50,000 to the DNC. Assuming that these were "Excess Campaign Funds" pursuant to 11 C.F.R. 113.2(c) Gage was advised that it was all right to do so. The funds were transferred by wire transfer to the DNC's account at the National Bank of Washington.^{2/} The respondents took steps to rectify the violation immediately upon receiving notice from RAD that the funds appeared excessive. The CEC requested and received a refund from the DNC within ten days of notification.

^{2/} See Attachment 2.

At the time that this matter was referred to the Office of General Counsel from the Reports Analysis Division, Ursula Culver was serving as acting treasurer. Indeed, an amended Statement of Organization for DNC Services Corporation/Democratic National Committee, dated March 8, 1983, is signed by Ursula Culver, as acting treasurer, is an amended Statement of Organization of May 18, 1983. (See Attachments). It was for this reason that Ms. Culver was named as treasurer in the First General Counsel's Report recommending reason to believe against the DNC Services Committee.

The successor treasurer, Paul G. Kirk, Jr., signed an amended Statement of Organization dated July 21, 1983, as well as another such Statement of September 20, 1983. While it might have been more appropriate to have named Ursula Culver as acting treasurer in the First General Counsel's Report or more accurately to have named Charles E. Curry as treasurer, the fact remains that Paul G. Kirk, Jr. is now the treasurer and naming him in his official capacity as the successor treasurer is in line with Commission policy.

IV. RECOMMENDATIONS

85040512745

- 2.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

August 9, 1984
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Copies of Statement of Organization Reports
of DNC Services Corporation
2. Letter from Jay Myerson, Assistant General Counsel
of DNC, dated July 30, 1980
3. Proposed conciliation agreements
4. Proposed letters

85040312746

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

DEC 2 1982 14:04

(Summary Page)

1. Name of Committee (in Full)

DNC Services Corporation/
Democratic National Committee

Address (Number and Street)
1625 Mass. Avenue, N.W.

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

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00010603

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. 2, 1982 in the State of _____
☐ Termination Report

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

SUMMARY

5. Covering Period 10/14/82 Through 11/22/82

6. (a) Cash on Hand January 1, 1982

(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**

		\$ 687,180.21
\$	466,964.37	
\$	1,410,286.91	\$
\$	1,877,251.28	\$
\$	1,496,042.68	\$
\$	379,208.60	\$
\$		
\$2,412,304.24		

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 202-633-4888

Charles E. Curry

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.

FEC FORM 3R (3/80)

85040512747

STATEMENT OF ORGANIZATION

RECEIVED A 100

(See reverse side for instructions)

1. (a) Name of Committee (in Full) DNC SERVICES Corporation/Democratic National Committee	☐ Check if name or address is changed.	2. Date March 8, 1983
(b) Address (Number and Street) 1625 Massachusetts Avenue, N.W.		3. FEC Identification Number C00010603
(c) City, State and ZIP Code Washington, D.C. 20036		4. Is this an amended Statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/Overseas
-------------------	-----------------------------	---------------	----------------

☐ (c) This committee supports/expresses only one candidate (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/expresses more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

6. If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
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8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
Ursula Culver	1625 Massachusetts Avenue, N.W. Washington, D.C. 20036	Acting Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
National Bank of Washington..	17th & L Streets, N.W. Washington, D.C. 20036
Democratic National Telethon Five	
a/c# 1 160 71 0	

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

Ursula Culver	<i>Ursula Culver</i>	Attachment March 8, 1983
Type or Print Name of Treasurer Acting	SIGNATURE OF TREASURER Acting	Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9630, Local 202-623-4088

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FEC FORM 1 (3/80)

8303267517

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) Name of Committee (in Full) Democratic National Committee (b) Check if name or address is changed ☐ Date 11/12/97
 (c) Address (Number and Street) 1675 Massachusetts Avenue, N.W.
 (d) City, State and ZIP Code Washington, D.C. 20036 4. Is this an amended statement? ☐

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
 Name of Candidate _____ Candidate Party Affiliation _____ Office Sought _____ State/District _____
☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
 (Name of candidate) _____
☐ (d) This committee is a _____ committee of the _____ Party.
 (National, State or subordinate) (Democratic, Republican, etc.)
☐ (e) This committee is a separate segregated fund.
☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

7. If the registering political committee has identified a "connected organization" above, please indicate type of organization:
☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

8. Collection of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position

9. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
-----------	------------------------------	-------------------

10. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
National Bank of Washington	17th & L Streets, N.W.
Democratic National Telethon V	Washington, D.C. 20036
State Parties a/c # 1 222 95 3	
D.C. National Bank	1801 V Street, N.W. Washington, D.C. 20006

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

Margula Culver
 Type or Print Name of Treasurer
 Acting

Margula Culver
 SIGNATURE OF TREASURER
 Acting

Attachment
 Date 11/19/97
P.S.

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 4372.

For further information contact:

Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4000

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REC FORM 1, 3-90

85040312749

DEMOCRATIC

NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 - (202)797-5900

6CC 4191

14 JUL 30 P 2: 23

MUR 1581
Whitehead

July 30, 1984

HAND DELIVER

Thomas Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1580

Dear Tom:

This letter responds to your recent questions concerning the above-referenced MUR.

1. Who requested confirmation from Mr. Michael F. Steed "that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000"?

Mr. Michael Gage requested said confirmation during a telephone conversation he had with Mr. Steed on or about October 11, 1982.

2. How was the contribution transmitted to the DNC?

The contribution was made by wire transfer to the Democratic National Committee's account with the National Bank of Washington.

3. Who is McCarthy?

Mr. Leo McCarthy presently is the Lieutenant Governor of California. Prior to being elected Lieutenant Governor, Mr. McCarthy served in the California State Assembly from 1970 through 1982, was Speaker of the California State Assembly from 1974-1980, and was Speaker Pro Tempore from 1980 through 1982. We are advised that during 1979, Mr. McCarthy contemplated a campaign for United States Senate and subsequently decided to be a candidate for Lieutenant Governor.

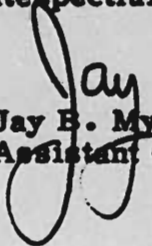
Attachment 2

85040512750

Thomas Whitehead, Esq.
Page 2
July 30, 1984

We hope that this information will make it possible to expeditiously conclude this matter per our previous request.

Respectfully submitted,


Jay B. Myerson
Assistant General Counsel

JBM:mls

85040312751

**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 - (202)797-5900

14 JUL 30 P 2: 23

*MUR 1580
Whitehead*

July 30, 1984

HAND DELIVER

Thomas Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1580

Dear Tom:

This letter responds to your recent questions concerning the above-referenced MUR.

1. Who requested confirmation from Mr. Michael F. Steed "that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000"?

Mr. Michael Gage requested said confirmation during a telephone conversation he had with Mr. Steed on or about October 11, 1982.

2. How was the contribution transmitted to the DNC?

The contribution was made by wire transfer to the Democratic National Committee's account with the National Bank of Washington.

3. Who is McCarthy?

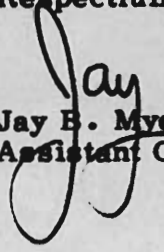
Mr. Leo McCarthy presently is the Lieutenant Governor of California. Prior to being elected Lieutenant Governor, Mr. McCarthy served in the California State Assembly from 1970 through 1982, was Speaker of the California State Assembly from 1974-1980, and was Speaker Pro Tempore from 1980 through 1982. We are advised that during 1979, Mr. McCarthy contemplated a campaign for United States Senate and subsequently decided to be a candidate for Lieutenant Governor.

85040512752

Thomas Whitehead, Esq.
Page 2
July 30, 1984

We hope that this information will make it possible to expeditiously conclude this matter per our previous request.

Respectfully submitted,


Jay B. Myerson
Assistant General Counsel

JBM:mls

85040512753



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 3, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: TOM WHITEHEAD

FROM: SHAWN WOODHEAD *[Signature]*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1581 - DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL
COMMITTEE (DNC)

Please review the attached Requests for Additional Information (RFAs) for the 1984 February and March Monthly Reports, and the Informational Notice (IN) for the 1984 April Monthly Report which are to be sent to the DNC. If no response or an inadequate response is received for either RFA, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6th. Thank you.

COMMENTS:

[Handwritten signature]
[Handwritten signature]

Attachments

85040512754



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: February Monthly (1/1/84-1/31/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Line 11b of the Detailed Summary Page your report discloses \$131,800 in contributions from Political Party Committees. However, Schedule A shows that amount to be \$146,800. Please amend your report to clarify the discrepancy.

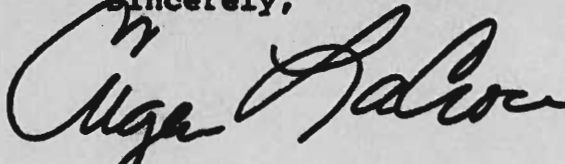
-Your committee's report includes a new computerized format for supporting Schedule B. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedule B that was approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-On Schedule D of your report you have failed to disclose the purpose of each debt, or listed it as "Professional Services" or "Fees". Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the actual purpose of each debt. (11 CFR 104.11)

85040512755

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eugene LaCroce", written in a cursive style.

Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512756

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, DAY, YEAR AMOUNT OF EACH EXPENDITURE THIS PERIOD

EARL CLIFTON BOYD 3126 BERRY ROAD NE WASHINGTON DC 20018	Fees	12/21/83	220.00
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GEORGE A BRANFEN 6708 WESTON AVE CAPITAL HEIGHTS MD 20743	Fees	12/21/83	275.00
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MICHAEL BROWN 4525 SANGA ONE RD BETHESDA, MD 20016	Prof. Services	12/23/83	125.00
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CHS MAILING 1793 OLIVE ST. CAPITOL HEIGHTS, MD 20743	Postage	12/20/83	1,570.18
--	---------	----------	----------

CAMPAIGN FURNITURE INC 1915 FIFTH STREET SE WASHINGTON DC 20002	Office Expenses	12/16/83	225.00
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CAPITAL MAILING 12012 OLD BALTIMORE PIKE BELTSVILLE MD 20705	Postage	12/30/83	4,180.69
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COMPUTER DYNAMICS INC 4651 KING STREET ALEXANDRIA VA 22302	Computer Services	12/21/83 12/23/83	4,500.00 4,633.50
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CRAVER, MATHEWS, SMITH & CO. 282 N. WASHINGTON STREET FALLS CHURCH, VA 22046	Prof. Services	12/30/83	9,158.00
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8504054227157-9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: March Monthly (2/1/84-2/29/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-Your committee's report includes a new computerized format for supporting Schedule B. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedule B that was approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-On Schedule D of your report you have failed to disclose the purpose of each debt, or listed it as "Professional Services" or "Fees". Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the actual purpose of each debt. (11 CFR 104.11)

85040512758

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. (11 CFR 104.3(d)) The February Monthly Report discloses an ending debt balance for the following creditors that differs from the beginning balance disclosed on the March Monthly:

COMPAC

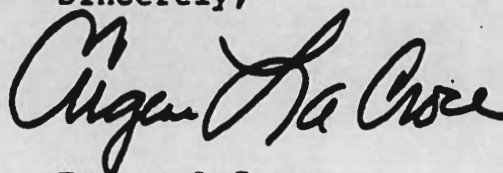
(February ending = \$9,131.27, March beginning = \$0)

Huntington T. Block

(February ending = \$1,049, March beginning = \$5,344)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512759

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, AMOUNT OF EACH EX-
AND ZIP CODE DAY, YEAR PENDITURE THIS PERIOD

EARL CLIFTON BOYD 3126 BERRY ROAD NE WASHINGTON DC	20018	Fees	12/21/83	220.00
--	-------	------	----------	--------

GEORGE A BRANMER 6708 WESTON AVE CAPITAL HEIGHTS MD	20743	Fees	12/21/83	275.00
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MICHAEL BROWN 4525 SANGA ORE RD BETHESDA, MD	20016	Prof. Services	12/23/83	125.00
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CHS MAILING 1793 OLIVE ST. CAPITOL HEIGHTS, MD	20743	Postage	12/20/83	1,570.18
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CAMPAIGN FURNITURE INC 1915 FIFTH STREET SE WASHINGTON DC	20002	Office Expenses	12/16/83	225.00
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CAPITAL MAILING 12012 OLD BALTIMORE PIKE BELTSVILLE MD	20705	Postage	12/30/83	4,180.69
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COMPUTER DYNAMICS INC 4651 KING STREET ALEXANDRIA VA	22302	Computer Services	12/21/83 12/23/83	4,500.00 4,633.50
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CRAVER, MATHEWS, SMITH & CO. 282 N. WASHINGTON STREET FALLS CHURCH, VA	22046	Prof. Services	12/30/83	9,158.00
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8504051227600-9



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-5

Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee's report includes a new computerized format for supporting Schedules B and D. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedules B and D that were approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-Your committee has reported a \$3,000 receipt and a \$6,627.66 negative entry on Schedule A for the Governors' Salute Committee (See Attached). Please explain the nature of this transaction.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512761

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, AMOUNT OF EACH EX-
AND ZIP CODE DAY, YEAR PENDITURE THIS PERIOD

EARL CLIFTON BOYD 3126 BERRY ROAD NE WASHINGTON DC	20018	Fees	12/21/83	220.00
--	-------	------	----------	--------

GEORGE A BRANNER 6708 WESTON AVE CAPITAL HEIGHTS MD	20743	Fees	12/21/83	275.00
---	-------	------	----------	--------

MICHAEL BROWN 4525 SANGA ONE RD BETHESDA, MD	20016	Prof. Services	12/23/83	125.00
--	-------	----------------	----------	--------

CMS MAILING 1793 OLIVE ST. CAPITOL HEIGHTS, MD	20743	Postage	12/20/83	1,570.18
--	-------	---------	----------	----------

CAMPAIGN FURNITURE INC 1915 FIFTH STREET SE WASHINGTON DC	20002	Office Expenses	12/16/83	225.00
---	-------	-----------------	----------	--------

CAPITAL MAILING 12012 OLD BALTIMORE PIKE BELTSVILLE MD	20705	Postage	12/30/83	4,180.69
--	-------	---------	----------	----------

COMPUTER DYNAMICS INC 4651 KING STREET ALEXANDRIA VA	22302	Computer Services	12/21/83 12/23/83	4,500.00 4,633.50
--	-------	-------------------	----------------------	----------------------

CRAYER, MATHEWS, SMITH & CO. 282 N. WASHINGTON STREET FALLS CHURCH, VA	22046	Prof. Services	12/30/83	9,158.00
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NAME OF COMMITTEE (IN FULL)

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS AND ZIP CODE OF DEBTOR OR CREDITOR AND NATURE OF DEBT	OUTSTANDING BALANCE BEGINNING THIS PERIOD	AMOUNT INCURRED THIS PERIOD	PAYMENTS THIS PERIOD	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
AUTOMATED CORRESPONDENCE SYSTEM 2120 L ST., N.W. WASHINGTON, D.C. 20037 Printing	345.08	.00	adj 60 344.48	0
BULK MAILING & ADDRESSES INC 4803 LAWRENCE STREET HYATTSVILLE MD 20721 Postage	.00	2,068.48	.00	2,068.48
ROBERT E BURGESS 305 SHIRLEY ST FALLS CHURCH VA 22046 Prof. Services	75.00	.00	.00	75.00
CAPITAL MAILING 12012 OLD BALTIMORE PIKE BELTSVILLE MD 20705 Postage	742.90	4,180.69	Credit Memo 742.90 4,180.69	0
COMPAC 14809 STONEGATE TERRACE SILVER SPRING, MD 20904 Computer Services	103,925.68	.00	Credit Memo 4,477.56 .00	99,448.12
Computer Business Supplies P.O. Box 15680 Baltimore, MD Printing	3,244.81	.00	.00	3,244.81
COMPOSITION SYSTEMS 1011 ARLINGTON BLVD. ARLINGTON, VA 22209 Printing	21.84	.00	.00	21.84
COMPUTER BUSINESS SUPPLIES PO BOX 15680 BALTIMORE MD 21263 Printing	.00	20,020.11	.00	20,020.11
CRAVER, MATHEWS, SMITH & CO. 282 N. WASHINGTON STREET FALLS CHURCH, VA 22046 Prof. Services	17,822.25	.00	pd 4/7/83 14.55 9,158.00	8,649.70

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

Committee (in Full)

GOVERNORS' SALUTE COMMITTEE

Name, Mailing Address and ZIP Code McGlothlin, W.W. McGlothlin, Street, N.D. Street, F.B. Fowler Apton, L.B. Fletcher, A.P. Moore BOX 1280, Bristol, Virginia 24201 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Partnership letter sent Occupation Aggregate Year-to-Date-\$	Date (month, day, year) 3/22/84	Amount of Each Receipt this Period \$ 400.00
Name, Mailing Address and ZIP Code GOVERNORS' SALUTE COMMITTEE 25 Massachusetts Avenue., N.W. Washington, D.C. 20036 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Refund Occupation Aggregate Year-to-Date-\$	Date (month, day, year) 3/22/84	Amount of Each Receipt This Period 3,000.00
Full Name, Mailing Address and ZIP Code Less 40% expenses deducted by Governor's Salute Committee prior to Distribution. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) 3/22/84	Amount of Each Receipt This Period (6,627.66)
D. Full Name, Mailing Address and ZIP Code Russell R. Miller 300 Montgomery St, San Francisco, CA 94104 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Miller Inc. Occupation Owner Aggregate Year-to-Date-\$	Date (month, day, year) 2/27/84	Amount of Each Receipt This Period <10,000.00> Invalid check
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional) 27			\$152,940



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: TOM WHITEHEAD

FROM: SHAWN WOODHEAD *[Signature]*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1581 - DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL
COMMITTEE (DNC)

Please review the attached Requests for Additional Information (RFAIs) for the 1984 February and March Monthly Reports, and the Informational Notice (IN) for the 1984 April Monthly Report which are to be sent to the DNC. If no response or an inadequate response is received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6th. Thank you.

COMMENTS:

Attachments

85040512765



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: February Monthly (1/1/84-1/31/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Line 11b of the Detailed Summary Page your report discloses \$131,800 in contributions from Political Party Committees. However, Schedule A shows that amount to be \$146,800. Please amend your report to clarify the discrepancy.

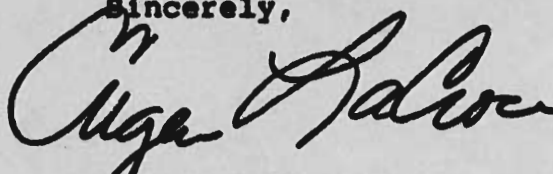
-Your committee's report includes a new computerized format for supporting Schedule B. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedule B that was approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-On Schedule D of your report you have failed to disclose the purpose of each debt, or listed it as "Professional Services" or "Fees". Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the actual purpose of each debt. (11 CFR 104.11)

85040512766

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eugene LaCroce".

Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512767

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, AMOUNT OF EACH EX-
AND ZIP CODE DAY, YEAR PENDITURE THIS PERIOD

EARL CLIFTON BOTS
3126 BERRY ROAD NE
WASHINGTON DC 20018 Fees
12/21/83 220.00

GEORGE A BRAHNER
6708 WESTON AVE
CAPITAL HEIGHTS MD 20743 Fees
12/21/83 275.00

MICHAEL BROWN
4525 SANGA CREEK RD
BETHESDA, MD 20016 Prof. Services
12/23/83 125.00

CMS MAILING
1793 OLIVE ST.
CAPITOL HEIGHTS, MD 20743 Postage
12/20/83 1,570.18

CAMPAIGN FURNITURE INC
1915 FIFTH STREET SE
WASHINGTON DC 20002 Office Expenses
12/16/83 225.00

CAPITAL MAILING
12012 OLD BALTIMORE PIKE
BELTSVILLE MD 20705 Postage
12/30/83 4,180.69

COMPUTER DYNAMICS INC
4651 KING STREET
ALEXANDRIA VA 22302 Computer Services
12/21/83 4,500.00
12/23/83 4,633.50

CRAVER, MATHEWS, SMITH & CO.
282 N. WASHINGTON STREET
FALLS CHURCH, VA 22046 Prof. Services
12/30/83 9,158.00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

**Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036**

Identification Number: C00010603

Reference: March Monthly (2/1/84-2/29/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-Your committee's report includes a new computerized format for supporting Schedule B. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedule B that was approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-On Schedule D of your report you have failed to disclose the purpose of each debt, or listed it as "Professional Services" or "Fees". Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the actual purpose of each debt. (11 CFR 104.11)

85040512769

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. (11 CFR 104.3(d)) The February Monthly Report discloses an ending debt balance for the following creditors that differs from the beginning balance disclosed on the March Monthly:

COMPAC

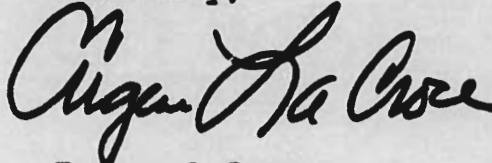
(February ending = \$9,131.27, March beginning = \$0)

Huntington T. Block

(February ending = \$1,049, March beginning = \$5,344)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512770

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, AMOUNT OF EACH EX-
AND ZIP CODE DAY, YEAR PENDITURE THIS PERIOD

EARL CLIFTON BOYD
3126 BERRY ROAD NE
WASHINGTON DC 20018 Fees
12/21/83 220.00

GEORGE A BRANMER
8708 VESTON AVE
CAPITAL HEIGHTS MD 20743 Fees
12/21/83 275.00

NICHAEEL BROWN
4525 SANGA CREEK RD
BETHESDA, MD 20016 Prof. Services
12/23/83 125.00

CMS MAILING
1793 OLIVE ST.
CAPITOL HEIGHTS, MD 20743 Postage
12/20/83 1,570.18

CAMPAIGN FURNITURE INC
1915 FIFTH STREET SE
WASHINGTON DC 20002 Office Expenses
12/16/83 225.00

CAPITAL MAILING
12012 OLD BALTIMORE PIKE
BELTSVILLE MD 20705 Postage
12/30/83 4,180.69

COMPUTER DYNAMICS INC
4651 KING STREET
ALEXANDRIA VA 22302 Computer Services
12/21/83 4,500.00
12/23/83 4,633.50

CRAYER, MATHEWS, SMITH & CO.
282 N. WASHINGTON STREET
FALLS CHURCH, VA 22046 Prof. Services
12/30/83 9,158.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Paul G. Kirk Jr., Treasurer
DNC Services Corporation/Democratic
National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Kirk:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee's report includes a new computerized format for supporting Schedules B and D. Section 11 CFR 104.2(d) requires all computer produced schedules to be approved by the Commission. Please find attached a copy of the computerized Schedules B and D that were approved for your use in 1982. Please submit a sample of the proposed format with a request for approval. Until approval is granted, please file schedules using the old format, or submit the schedules on FEC forms.

-Your committee has reported a \$3,000 receipt and a \$6,627.66 negative entry on Schedule A for the Governors' Salute Committee (See Attached). Please explain the nature of this transaction.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040512772

NAME OF CANDIDATE OR COMMITTEE IN FULL

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS PURPOSE OF EXPENDITURE DATE - MONTH, AMOUNT OF EACH EX-
AND ZIP CODE DAY, YEAR PENDITURE THIS PERIOD

EARL CLIFTON BOYD
3126 BERRY ROAD NE
WASHINGTON DC 20018 Fees
12/21/83 220.00

GEORGE A BRANHER
6708 VESTON AVE
CAPITAL HEIGHTS MD 20743 Fees
12/21/83 275.00

NICHAEI BROWN
4525 SANGA CREEK RD
BETHESDA, MD 20016 Prof. Services
12/23/83 125.00

CMS MAILING
1793 OLIVE ST.
CAPITOL HEIGHTS, MD 20743 Postage
12/20/83 1,570.18

CAMPAIGN FURNITURE INC
1915 FIFTH STREET SE
WASHINGTON DC 20002 Office Expenses
12/16/83 225.00

CAPITAL MAILING
12012 OLD BALTIMORE PIKE
BELTSVILLE MD 20705 Postage
12/30/83 4,180.69

COMPUTER DYNAMICS INC
4651 KING STREET
ALEXANDRIA VA 22302 Computer Services
12/21/83 4,500.00
12/23/83 4,633.50

CRAVER, MATHEWS, SMITH & CO.
282 N. WASHINGTON STREET
FALLS CHURCH, VA 22046 Prof. Services
12/30/83 9,158.00

NAME OF COMMITTEE (IN FULL)

DNC SERVICES CORPORATION

FULL NAME, MAILING ADDRESS AND ZIP CODE OF DEBTOR OR CREDITOR AND NATURE OF DEBT	OUTSTANDING BALANCE BEGINNING THIS PERIOD	AMOUNT INCURRED THIS PERIOD	PAYMENTS THIS PERIOD	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
AUTOMATED CORRESPONDENCE SYSTEM 2120 L ST., N.W. WASHINGTON, D.C. 20037 Printing	345.00	.00	adj 60 344.48	0
BULK MAILING & ADDRESSES INC 4803 LAWRENCE STREET HYATTSVILLE MD 20781 Postage	.00	2,868.48	.00	2,868.48
ROBERT E BURGESS 305 SHIRLEY ST FALLS CHURCH VA 22046 Prof. Services	75.00	.00	.00	75.00
CAPITAL MAILING 12012 OLD BALTIMORE PIKE BELTSVILLE MD 20705 Postage	742.90	4,180.69	Credit Memo 742.90 4,180.69	0
COMPAC 14809 STONEGATE TERRACE SILVER SPRING, MD 20904 Computer Services	103,925.68	.00	Credit Memo 4,677.56 .00	99,448.12
COMPUTER BUSINESS SUPPLIES P.O. Box 15680 Baltimore, MD Printing	3,244.81	.00	.00	3,244.81
COMPOSITION SYSTEMS 1011 ARLINGTON BLVD. ARLINGTON, VA 22209 Printing	21.84	.00	.00	21.84
COMPUTER BUSINESS SUPPLIES PO BOX 15680 BALTIMORE MD 21263 Printing	.00	20,020.11	.00	20,020.11
CRAVER, MATHEWS, SMITH & CO. 282 N. WASHINGTON STREET FALLS CHURCH, VA 22046 Prof. Services	17,822.25	.00	pd 4/1/83 14.55 9,158.00	8,649.70

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER
(Use number scheduled for each category of the Detailed Summary Page)

Any information copied from such Reports or 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)

GOVERNORS' SALUTE COMMITTEE

A. Full Name, Mailing Address and ZIP Code
J.W. McGlothlin, W.W. McGlothlin,
H.A. Street, N.D. Street, F.B. Fowler
D. Crompton, L.B. Fletcher, A.P. Moore
P.O. BOX 1280, Bristol, Virginia 24201

Name of Employer

Partnership letter sent

Date (month,
day, year)

Amount of Each
Receipt this Period

Occupation

3/22/84

\$ 400.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code
GOVERNORS' SALUTE COMMITTEE
1625 Massachusetts Avenue., N.W.
Washington, D.C. 20036

Name of Employer

Refund

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

3/22/84

3,000.00

Receipt For: ☐ Primary ☐ General
☒ Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code
Less 40% expenses deducted by
Governor's Salute Committee prior
to distribution.

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

3/22/84

(6,627.66)

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code
Russel R. Miller
300 Montgomery St,
San Francisco, CA 94104

Name of Employer

Miller Inc.

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation
Owner

2/27/84

<10,000.00>
Invalid check

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

27

\$152,940.34



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: MAY 30, 1984
SUBJECT: ADDITIONAL OBJECTION - MUR 1581
General Counsel's Report
signed May 24, 1984

The above-named document was circulated to the
Commission on Friday, May 25, 1984 at 2:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u>X</u>
Commissioner Harris	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Reiche	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, June 5, 1984.

85040512776



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: MAY 29, 1984
SUBJECT: OBJECTION - MUR 1581 General Counsel's
Report signed May 24, 1984

The above-named document was circulated to the
Commission on Friday, May 25, 1984 at 2:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	X (vote sheet attached)
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, June 5, 1984.

85040512777



RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

SENSITIVE

FEDERAL ELECTION COMMISSION

WAS 84 MAY 29 20:11:05

Date and Time Transmitted: FRIDAY, 5-25-84, 2:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, MAY 30, 1984, 2:00

SUBJECT: MUR 1581 - GENERAL COUNSEL'S REPORT
signed May 24, 1984

- () I approve the recommendation
(X) I object to the recommendation

COMMENTS:

In discussion

Date: 5-29-84

Signature:

Lee Ann Elliott

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

85040512778



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *ut*
DATE: May 24, 1984
SUBJECT: MUR 1581 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [x]
Sensitive [x]
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

85040512779

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Californians for an Effective Congress,) MUR 1580
 and F. Keenen Behrle, as treasurer,)
 DNC Services Corporation, et al.)

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on January 24, 1984, do hereby certify that the Commission decided by a vote of 6-0 to return to the Office of General Counsel the January 16, 1984 report on the above-captioned matter with a request for additional facts relevant to the case and for a review of Commission policy as discussed during the meeting.

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

Attest:

1-25-84

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

85040512790



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JANUARY 18, 1984
SUBJECT: OBJECTIONS - MUR 1580 Memorandum to the
Commission dated January 16, 1984

The above-named document was circulated to the
Commission on Monday, January 16, 1984 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u></u>
Commissioner Harris	<u>X</u>
Commissioner McDonald	<u>X</u>
Commissioner McGarry	<u></u>
Commissioner Reiche	<u></u>

This matter will be placed on the Executive Session
agenda for Tuesday, January 24, 1984.

85040512781



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JANUARY 18, 1984
SUBJECT: OBJECTION - MUR 1580 Memorandum to the
Commission dated January 16, 1984

The above-named document was circulated to the
Commission on Monday, January 16, 1984 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	<u> X </u>
Commissioner McDonald	<u> X </u>
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, January 24, 1984.

85040512782



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JANUARY 17, 1984
SUBJECT: OBJECTION - MUR 1580 Memorandum to the
Commission dated January 16, 1984

The above-named document was circulated to the
Commission on Monday, January 16, 1984 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, January 24, 1984.

85040512783



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: Janaury 16, 1984
SUBJECT: MUR 1580 - Memorandum to The Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

85040512784

Memorandum to the File

MUR 1581

Subject: Californians for an Effective Congress, and P. Keenan
Behrle as treasurer, DNC Services Corporation, et at

It should be noted that in the footnote on Page 4 of the
General Counsel's Briefs, dated December 19, 1983, there is a
reference to "former Senator McCarthy." This reference is in
error. The exploratory committee in this matter was that of
Leo McCarthy, the Lieutenant Governor of California.

95040512795



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 DEC 20 A10: 13

December 20, 1983

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

SUBJECT: MUR 1580

SENSITIVE

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on December 20, 1983. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

Briefs - two

Letters to Respondents - two

85040512785



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 20, 1983

David M. Ifshin, Esquire
Californians for an Effective
Congress
Nossaman, Guthner, Knox & Elliott
Sixth Floor
1140 Nineteenth Street, N.W.
Washington, D.C. 20036-6699

RE: MUR 1580

Dear Mr. Ifshin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on October 3, 1983, found reason to believe that your client, Californians for an Effective Congress, had violated 2 U.S.C. § 441a and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

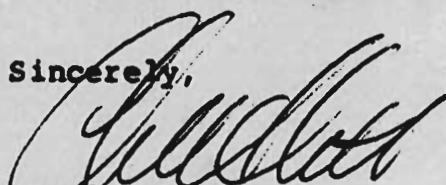
85040512797

David M. Ifshin, Esquire
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

85040512788

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Californians for an
Effective Congress

)
)
) MUR 1580
)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was generated as a result of a referral from the Reports Analysis Division to the Office of General Counsel.

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed the \$50,000 contribution received from Californians for an Effective Congress ("CEC"). The contribution was received on October 28, 1982. A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983, requesting that the committee refund the amount in excess or amend its report.

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response

9
8
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0
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to the Commission's request. The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March 16, 1983, which included a photocopy of the repayment check.

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

II. Legal Analysis

Pursuant to 2 U.S.C. § 439a,

"Amounts received by a candidate as contributions that are in excess of any amount necessary to defray his expenditures . . . may be used for any other lawful purpose, including transfers without limitation to any national, State, or local committee of any political party. . . ."

85040512790

In this matter, Californians for an Effective Congress was not registered as nor operating as a single candidate committee when the transactions at issue here were made. Thus, the above cited provision is not applicable here because CEC is a multicandidate committee.

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue appeared to have been made and accepted in violation of 2 U.S.C. § 441a. Therefore, on October 3, 1983, the Commission found reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a and found reason to believe the DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f) and so notified the respondents.

Both parties have filed responses to the General Counsel's Factual and Legal Analysis.

CEC responded by stating that it was organized in 1979 to serve as an exploratory committee for Eugene McCarthy who at that time was considering a federal candidacy. When McCarthy decided not to become a candidate, the Committee was renamed and began operating as a multicandidate committee. As soon as the transaction was questioned, CEC immediately requested and received a refund from the DNC.

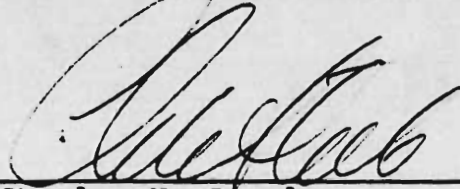
85040512791

The DNC responded by reiterating its previous position and added that it had promptly refunded the \$35,000 in question "even though it was and is far from clear that such a refund was required since the transfer consisted of excess campaign funds from Mr. McCarthy's exploratory committee which were distributed by the same, albeit renamed, committee."*/ Because of the fact that the excessive contribution by CEC and its receipt by DNC was \$35,000, this Office is of the opinion that probable cause to believe is required.

III. General Counsel's Recommendation

It is recommended that the Commission find probable cause to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.

19 December 1973
Date


Charles N. Steele
General Counsel

*/ DNC's reliance on 11 C.F.R. § 113.2(c) for its contention that the excess funds of a campaign may be transferred without limitation to a national committee in this matter is misplaced. That subsection of the regulations has as its statutory authority 2 U.S.C. § 439a, which allows "amounts recovered by a candidate" to be transferred without limitation to a national party. In this case, the McCarthy Committee was an exploratory committee directed toward "testing the waters" for former Senator McCarthy's candidacy; however, since he did not become a candidate, that section could not have application in this case even though the point was mooted by the multicandidate status of CEC at the time of the contribution.

85040512792



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 20, 1983

Anthony S. Harrington
General Counsel
Jay B. Myerson
Assistant General Counsel
Democratic National Committee
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1580

Dear Mr. Harrington:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on October 3, 1983, found reason to believe that your client, DNC Services Corporation, had violated 2 U.S.C. § 441a(f) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

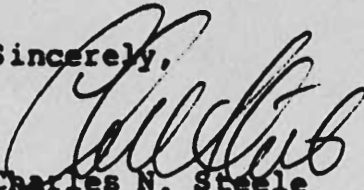
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Anthony S. Harrington
Jay B. Myerson
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

85040512794

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

DNC Services Corporation)

MUR 1580

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was generated as a result of a referral from the Reports Analysis Division to the Office of General Counsel.

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed the \$50,000 contribution received from Californians for an Effective Congress ("CEC"). The contribution was received on October 28, 1982. A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983, requesting that the committee refund the amount in excess or amend its report.

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response

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to the Commission's request. The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March-16, 1983, which included a photocopy of the repayment check.

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

II. Legal Analysis

Pursuant to 2 U.S.C. § 439a,

"Amounts received by a candidate as contributions that are in excess of any amount necessary to defray his expenditures . . . may be used for any other lawful purpose, including transfers without limitation to any national, State, or local committee of any political party. . . ."

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In this matter, Californians for an Effective Congress was not registered as nor operating as a single candidate committee when the transactions at issue here were made. Thus, the above cited provision is not applicable here because CEC is a multicandidate committee.

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue appeared to have been made and accepted in violation of 2 U.S.C. § 441a. Therefore, on October 3, 1983, the Commission found reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a and found reason to believe the DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f) and so notified the respondents.

Both parties have filed responses to the General Counsel's Factual and Legal Analysis.

CEC responded by stating that it was organized in 1979 to serve as an exploratory committee for Eugene McCarthy who at that time was considering a federal candidacy. When McCarthy decided not to become a candidate, the Committee was renamed and began operating as a multicandidate committee. As soon as the transaction was questioned, CEC immediately requested and received a refund from the DNC.

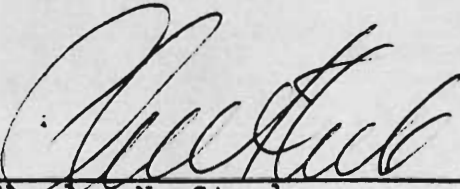
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The DNC responded by reiterating its previous position and added that it had promptly refunded the \$35,000 in question "even though it was and is far from clear that such a refund was required since the transfer consisted of excess campaign funds from Mr. McCarthy's exploratory committee which were distributed by the same, albeit renamed, committee."*/ Because of the fact that the excessive contribution by CEC and its receipt by DNC was \$35,000, this Office is of the opinion that probable cause to believe is required.

III. General Counsel's Recommendation

It is recommended that the Commission find probable cause to believe that DNC Services Corporation, and Paul G. Kirk, Jr. as treasurer, violated 2 U.S.C. § 441a(f).

19 December 1983
Date



Charles N. Steele
General Counsel

*/ DNC's reliance on 11 C.F.R. § 113.2(c) for its contention that the excess funds of a campaign may be transferred without limitation to a national committee in this matter is misplaced. That subsection of the regulations has as its statutory authority 2 U.S.C. § 439a, which allows "amounts recovered by a candidate" to be transferred without limitation to a national party. In this case, the McCarthy Committee was an exploratory committee directed toward "testing the waters" for former Senator McCarthy's candidacy; however, since he did not become a candidate, that section could not have application in this case even though the point was mooted by the multicandidate status of CEC at the time of the contribution.

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Gcc# 1091

LAW OFFICES

NOSSAMAN, GUTHNER, KNOX & ELLIOTT

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THIRD FLOOR
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SAN FRANCISCO, CA 94105-1271
(415) 543-2700

DAVID M. IFSHIN
OF COUNSEL

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(303) 595-8441

ORANGE COUNTY
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COSTA MESA, CA 92626-1881
(714) 545-3270

REFER TO FILE NUMBER

November 11, 1983

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

RE: MUR 1580/1581

Dear Ms. Callahan:

The Federal Election Commission ("Commission") determined on October 3, 1983 that there is reason to believe that Californians for an Effective Congress ("CEC" or "Committee") and F. Keenan Behrle, the Committee's treasurer, violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended ("the Act"). In the General Counsel's Factual and Legal Analysis ("the General Counsel's report") presented to the Commission for purposes of the reason to believe determination, it was reported that the 1982 30-Day Post General Election Report filed by the Committee disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") made on October 19, 1983. Following receipt of a Request for Additional Information, CEC's treasurer contacted the Reports Analysis Division by phone on March 7, 1983. According to the General Counsel's Report, the treasurer stated that he had misunderstood the provision in the Act permitting unlimited transfer of excess campaign funds to a committee of a political party. The General Counsel's Report states further that the following day the Committee's treasurer informed the Commission that the Committee had requested a refund. The Commission received an amended report from the Democratic National Committee on March 16, 1983 which included a photocopy of a repayment check in the amount of \$35,000 from the DNC to the Committee.

CEC was organized in 1979 to serve as an exploratory committee for an individual who at that time was considering a federal candidacy. When that individual decided not to become a candidate, the Committee was renamed and continued in existence as a multicandidate political committee. It was this

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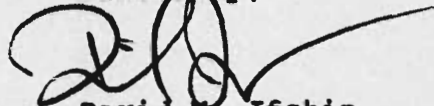
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NOSSAMAN, GUTHNER, KNOX, ELLIOTT

background that led to the mistaken impression that CEC had excess campaign funds for purposes of 11 C.F.R. §113.2(c). Upon notification by the Commission that it was not clear from the documents filed with the Commission that §113.2(c) was applicable, CEC immediately requested and received a refund from the DNC.

The excessive contribution was inadvertent and based on a mistaken understanding of an ambiguous provision of the Act. Since a full refund of the amount in excess of the \$441a limit was promptly made, CEC respectfully requests that this matter be closed without further action.

Sincerely,



David M. Ifshin
Counsel for Californians for
an Effective Congress

DMI/jhl

cc: F. Keenan Behrle

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LAW OFFICES

NOSSAMAN, GUTHNER, KNOX & ELLIOTT

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OF COUNSEL

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(714) 542-3270

3
REFER TO FILE NUMBER

November 1, 1983

A11: 47

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

RE: MUR 1580/1581

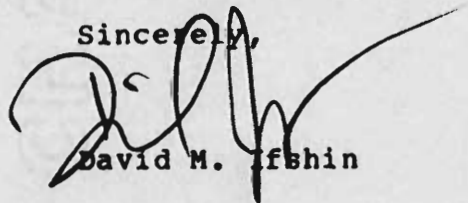
Dear Ms. Callahan:

Enclosed is a statement of designation of counsel executed by F. Keenan Behrle on behalf of Californians for an Effective Congress. I will be representing both the Committee and its treasurer, Mr. Behrle, in this action.

It is my understanding that materials to be submitted on behalf of the Committee and Mr. Behrle are to be received by the Commission no later than November 12, 1983. We look forward to the prompt resolution of this matter.

Thank you for your assistance.

Sincerely,



David M. Ifshin

DMI/jhl

cc: Keenan Behrle

Enclosure

85040512801

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: NOSSAMAN, GUTHNER, KNOX & ELLIOT
Attention: David Ifshin, Esq.
ADDRESS: 1140 19th Street, 6th Floor
Washington, D.C. 20036
TELEPHONE: (202) 223-9100

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.

10/27/83
Date

F. K. Behrle
Signature

NAME: F. Keenan Behrle

ADDRESS: 1800 Avenue of the Stars, Suite 500
Los Angeles, California 90067

HOME PHONE:

BUSINESS PHONE: (213) 277-1000

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Israel and Raley

Chartered
ATTORNEYS AT LAW
1513 16TH STREET, N.W.
WASHINGTON, D.C. 20036

FRED ISRAEL
CHARLES E. RALEY
JAY L. COHEN
EUGENE F. SHINE
JAY B. MYERSON
JAMES S. PHILLIPS
• VA. BAR ONLY

(202) 797-1144
TELECOPY (202) 797-0086

October 31, 1983

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Ms. Suzanne Callahan
Federal Election Commission
Washington, D.C. 20463

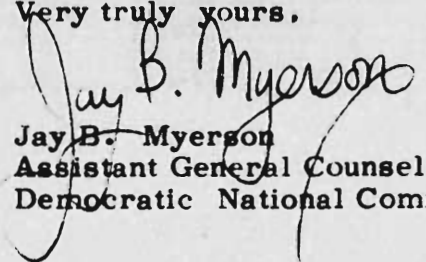
Re: MUR 1580

Dear Suzanne:

This letter confirms our telephone conversation wherein you agreed to enlarge the period within which the DNC Services Corporation and Ms. Culver may respond to the Federal Election Commission's reason to believe determination to and including November 12, 1983.

Thank you very much for your cooperation in this regard.

Very truly yours,



Jay B. Myerson
Assistant General Counsel
Democratic National Committee

JBm bmt

85040512803



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *OK*
DATE: October 6, 1983
SUBJECT: MUR 1580/1581 - Memo to COMM

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information [x]
Sensitive [x]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

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SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 1983

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: MUR 1580/1581- Memorandum to
Commission dated 10/5/83

On October 5, 1983, a memorandum concerning the above matters was circulated on a no-objection basis. Please withdraw this memorandum from circulation. At this time, no objections have been submitted.

83 OCT 6 P 2: 42

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COMMISSIONER
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *at*
DATE: October 5, 1983
SUBJECT: MUR 1580/1581: Memorandum to The Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection [x]
Sensitive [x]
Non-Sensitive []
Information []
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Non-Sensitive []
Other []

DISTRIBUTION

Compliance [x]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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OFFICE OF THE
COMMISSION SECRETARY

83 OCT 5 P 3: 55

October 5, 1983

MEMORANDUM

SENSITIVE

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

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1580/1581

On October 3, 1983, based on a referral from the Reports Analysis Division, the Commission found reason to believe that the DNC Services Corporation and Ursula Culver as treasurer violated 2 U.S.C. § 441a(f). Subsequent to the date of the referral, the respondent committee's treasurer changed to Paul G. Kirk, Jr.

In order that the certification in this matter reflect the current treasurer of the respondent committee, it is recommended that finding number 2 in the October 3, 1983 certification for MUR 1580/1581 be amended to read as follows:

2. Find reason to believe the DNC Services Corporation, and Paul G. Kirk, Jr. as treasurer, violated 2 U.S.C. § 441a(f).

Recommendation

Amend October 3, 1983 certification in MUR 1580/1581 as follows:

2. Find reason to believe the DNC Services Corporation, and Paul G. Kirk, Jr. as treasurer, violated 2 U.S.C. § 441a(f).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 1983

Ms. Ursula Culver, Comptroller
DNC Services Corporation
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1580

Dear Ms. Culver:

On October 3, 1983, the Federal Election Commission determined that there is reason to believe that you and the DNC Services Corporation violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the DNC Services Corporation, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

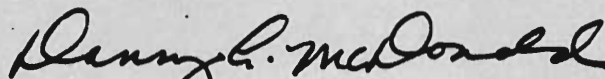
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Ms. Ursula Culver, Comptroller
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,



Danny L. McDonald,
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT DNC Services
Corporation
Ursula Culver,
Comptroller

MUR NO. 1580/1581
STAFF MEMBER & TELEPHONE NO.
Suzanne Callahan
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

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The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request. The treasurer stated that he had

misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March 16, 1983, which included a photocopy of the repayment check.

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue here appears to have been made and accepted in violation of 2 U.S.C. § 441a.

Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Therefore, the General Counsel recommends that the Commission find reason to believe that DNC Services Corporation, and Ursula Culver as acting treasurer at the time of the transaction, violated 2 U.S.C. § 441a(f).

RECOMMENDATION

2. Find reason to believe the DNC Services Corporation, and Ursula Culver as acting treasurer at the time of the transaction, violated 2 U.S.C. § 441a(f).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 17, 1983

F. Keenan Behrle, Treasurer
Californians for an Effective
Congress
1800 Avenue of the Stars
Suite 500
Los Angeles, California 90067

RE: MUR 1580

Dear Mr. Behrle:

On October 3, 1983, the Federal Election Commission determined that there is reason to believe that you and your committee violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

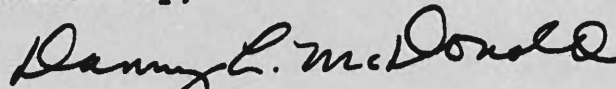
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Mr. F. Keenan Behrle, Treasurer
Page 2

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Sincerely,



Danny L. McDonald,
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040512814

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT	Californians for an Effective Congress F. Keenan Behrle, Treasurer	MUR NO. <u>1580/1581</u> STAFF MEMBER & TELEPHONE NO. <u>Suzanne Callahan</u> <u>(202) 523-4529</u>
-------------------	---	--

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue here appears to have been made and accepted in violation of 2 U.S.C. § 441a.

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Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Therefore, the General Counsel recommends that the Commission find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.

85040312817

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Californians for an Effective
Congress
DNC Services Corporation

MUR 1580/1581

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 3, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1580/1581:

1. Find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.
2. Find reason to believe the DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f).
3. Combine MURs 1580 and 1581.
4. Send the notifications as attached to the First General Counsel's Report dated September 29, 1983.

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

Attest:

10-3-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

9-29-83, 10:01
9-29-83, 4:00

85040312818



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: September 29, 1983
SUBJECT: MUR 1580/1581: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution below) ☐

85040512819

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT P 29 A10: 01

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION 9/29/83 - 10:00

MUR NO. 1580/1581
STAFF MEMBER
Suzanne Callahan

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Californians for an Effective Congress
DNC Services Corporation

RELEVANT STATUTE: 2 U.S.C. §§ 441a and 441a(f)

INTERNAL REPORTS CHECKED: Respondent's Files

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

These matters were referred to the Office of General Counsel by the Reports Analysis Division and on September 12, 1983, the Commission voted to open a Matter Under Review (MUR).

SUMMARY OF ALLEGATIONS

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RAFI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed the \$50,000

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contribution received from Californians for an Effective Congress ("CEC"). The contribution was received on October 28, 1982. A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983, requesting that the committee refund the amount in excess or amend its report.

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request. The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March 16, 1983, which included a photocopy of the repayment check.

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

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FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue here appears to have been made and accepted in violation of 2 U.S.C. § 441a. Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Thus, we recommend that the Commission find reason to believe violations have been committed.

RECOMMENDATIONS

1. Find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.
2. Find reason to believe the DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f).
3. Combine MURs 1580 and 1581.
4. Send attached notifications.

Charles N. Steele
General Counsel

Sept. 28, 1983
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

RAD Referrals (two)
Notification letters (two)
General Counsel's Factual and Legal Analyses (two)

85040512822

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983ANALYST: Pamela Brown

- I. COMMITTEE: Californians for an Effective Congress
(C00108266)
F. Keenan Behrle, Treasurer
1800 Avenue of the Stars, Suite 500
Los Angeles, CA 90067
- II. RELEVANT STATUTE: 2 U.S.C. 441a(a)(2)(B)
11 CFR 110.2(a)(2)

III. BACKGROUND:

Excessive Contribution to a Political Committee

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations (Attachment 2). A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely (Attachment 3).*

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request (Attachment 4). The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

*/ Californians for an Effective Congress, formerly registered as McCarthy for Senate Committee, qualified as a multicandidate committee on October 19, 1980.

35040312823

**RAD REFERRAL TO OGC
CALIFORNIANS FOR AN EFFECTIVE CONGRESS
PAGE 2**

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund (Attachment 5).

An amendment was received from the DNC on March 16, 1983, which disclosed a photocopy of the repayment check (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

85040512824

**RAD REFERRAL TO OGC
CALIFORNIANS FOR AN EFFECTIVE CONGRESS
PAGE 2**

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund (Attachment 5).

An amendment was received from the DNC on March 16, 1983, which disclosed a photocopy of the repayment check (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

85040512825

NON-PARTY RETAINED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE PERIOD	# OF PAGES	NICKNAME LOCATION
CALIFORNIANS FOR AN EFFECTIVE CONSUMER CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID AC00100200
1981	STATEMENT OF ORGANIZATION - AMENDMENT			15.JANU1	3	01FEC/197/1351
	MIN-TEAM REPORT	3,031	17,441	1JANU1 -30.JANU1	3	01FEC/203/1700
	MIN-TEAM REPORT - AMENDMENT	-	-	1JANU1 -30.JANU1	1	02FEC/240/1400
	REQUEST FOR ADDITIONAL INFORMATION			1JANU1 -30.JANU1	2	02FEC/232/1776
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JANU1 -30.JANU1	1	02FEC/234/2770
	TEAM-END	70,700	29,714	1JANU1 -31DEC01	10	02FEC/223/1205
	TEAM-END - AMENDMENT	70,700	29,714	1JANU1 -31DEC01	6	02FEC/217/1327
	TEAM-END - AMENDMENT	-	-	1JANU1 -31DEC01	3	02FEC/240/1260
	REQUEST FOR ADDITIONAL INFORMATION			1JANU1 -31DEC01	2	02FEC/232/1777
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JANU1 -31DEC01	3	02FEC/234/1740
1982	STATEMENT OF ORGANIZATION - AMENDMENT			4MAY82	2	02FEC/230/2607
	APRIL QUARTERLY	0,000	0	1JANU2 -31MAR82	4	02FEC/220/0607
	JULY QUARTERLY	2,644	0,163	1APR82 -30.JUN82	6	02FEC/217/1404
	OCTOBER QUARTERLY	3,592	144	1JANU2 -30SEP82	5	02FEC/251/1914
	PRE-GENERAL	309	25,000	1OCT82 -13OCT82	5	02FEC/251/1917
	POST-GENERAL	0	00,000	1OCT82 -22NOV82	4	02FEC/252/1074
	POST-GENERAL - AMENDMENT	-	-	1OCT82 -22NOV82	3	03FEC/267/2706
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -22NOV82	3	03FEC/200/2325
	TEAM-END	0	0	2JANU82 -31DEC82	3	03FEC/215/1277
	TOTAL	0,168	0 141,462	0	01	TOTAL PAGES

ALL REPORTS HAVE RECIEVED BASIC REVIEW.

Cash on Hand 12/31/82: \$21,525

Debts: -0-

ATTACHMENT 2
1982 Post-General Report

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)

Californians for an Effective Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Victory Fund 1731 "I" Street Sacramento CA 95814	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
B. Full Name, Mailing Address and ZIP Code Bosco for Congress P.O. Box 1494 Santa Rosa CA 95402	Purpose of Disbursement Doug Bosco 2nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
C. Full Name, Mailing Address and ZIP Code Brown for U.S. Senate 1126 W. 6th St. Los Angeles CA 90017	Purpose of Disbursement Edmund G. Brown, Jr. Senate Calif. 55,000 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
D. Full Name, Mailing Address and ZIP Code Glenn Anderson Campaign Committee 5217 Hagen Rd. Temple Hills MD	Purpose of Disbursement Glenn Anderson 32nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/20/82 10/26/82	500 500
E. Full Name, Mailing Address and ZIP Code Democratic National Committee 1625 Massachusetts Ave., N.W. Washington D.C. 20036	Purpose of Disbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/19/82	50,000
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			66,000
TOTAL This Period (last page this line number only)			66,000

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ATTACHMENT 2
 1982 Post-General Report

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Name of Committee (in Full)

Californians for an Effective Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Victory Fund 1731 "I" Street Sacramento CA 95814	Disbursement for: ☐ Primary ☒ General ☒ Other (specify):	10/18/82	5,000
B. Full Name, Mailing Address and ZIP Code Bosco for Congress P.O. Box 1494 Santa Rosa CA 95402	Purpose of Disbursement Doug Bosco 2nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 5,000
C. Full Name, Mailing Address and ZIP Code Brown for U.S. Senate 1126 W. 6th St. Los Angeles CA 90017	Purpose of Disbursement Edmund G. Brown, Jr. Senate Calif. 55,000 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 5,000
D. Full Name, Mailing Address and ZIP Code Glenn Anderson Campaign Committee 5217 Hagen Rd. Temple Hills MD	Purpose of Disbursement Glenn Anderson 32nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 10/20/82 10/26/82	Amount of Each Disbursement This Period 500 500
E. Full Name, Mailing Address and ZIP Code Democratic National Committee 1625 Massachusetts Ave., N.W. Washington D.C. 20036	Purpose of Disbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 10/19/82	Amount of Each Disbursement This Period 50,000
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			66,000
TOTAL This Period (last page this line number only)			66,000

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

16 February 1983

F. Keenan Behrle, Treasurer
Californians for An Effective
Congress
1800 Avenue of the Stars,
Suite 500
Los Angeles, CA 90067

Identification Number: C00108266

Reference: 30 Day Post-General Report (10/18/82-11/22/82)

Dear Mr. Behrle:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$15,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

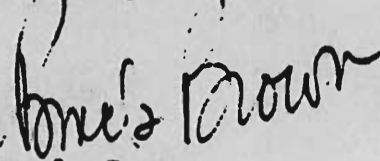
Although the Commission may take further legal steps concerning the excessive contribution(s), prompt action by you to obtain the refund of the excessive contribution will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

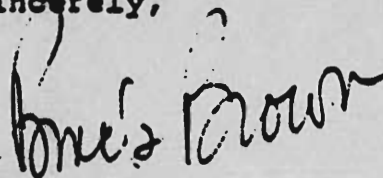
A handwritten signature in cursive script, appearing to read "Pamela Brown".

Pamela Brown
Senior Reports Analyst
Reports Analysis Division

85040512830

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Brown". The signature is written in dark ink and is positioned above the typed name.

Pamela Brown
Senior Reports Analyst
Reports Analysis Division

85040512831

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Californians for an Effective Congress

COMMITTEE CONTACT: F. Keenan Behrle (213) 277-1000

DATE: 3/7/83

ANALYST: P. Brown

SUBJECT: RFAI

Mr. Behrle called in response to the RFAI. He had not thought that the contribution was excessive since he thought his committee was entitled to give their excess campaign funds to DNC Services. I explained that the provision in the Regulations was intended for authorized committees only (11 CFR 113.2). He will request a refund from DNC Services, and respond to the Commission in writing.

85040512832

PACHT, ROSS, WARNE, BERNHARD & SEARS, INC.

ATTORNEYS AT LAW

1800 AVENUE OF THE STARS-SUITE 800
LOS ANGELES, CALIFORNIA 90007
(213) 277-1000

March 7, 1983

FEDERAL EXPRESS

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Federal Election Commission
Washington, D.C. 20463

RE: Identification No.: C00108266
Reference: 30 Day Post-General Report
(10/18/82-11/22/82)

Attention: Ms. Pamela Brown

Dear Ms. Brown:

This letter is in response to your letter of February 16, 1983 commenting on Schedule B of the above-referenced report for Californians for An Effective Congress which disclosed a contribution to the Democratic National Committee in the amount of \$50,000.

Since receiving your letter, I have looked into this contribution and have determined that it was made in error based upon a misunderstanding between the Democratic National Committee and the undersigned Committee. at the time the contribution was made, the Democratic National Committee mistakingly believed that Californians for An Effective Congress had been an authorized committee and that the contribution consisted of "excess campaign funds" as defined in Section 113.1(e) of Title 11 of the Code of Federal Regulations and that as such, the funds could be contributed to the Democratic National Committee without limit pursuant to Section 113.2(c) of Title 11 of the Code of Federal Regulations.

Upon receipt of your letter of February 16, I initiated further conversations with the Democratic National Committee during which the status of Californians for An Effective Congress was clarified with the Democratic National

85040512833
03032472041

ATTORNEYS AT LAW

1000 AVENUE OF THE STARS-SUITE 600
LOS ANGELES, CALIFORNIA 90007
12131 277-1000

March 7, 1983

FEDERAL EXPRESS

Federal Election Commission
Washington, D.C. 20463

RE: Identification No.: C00108266
Reference: 30 Day Post-General Report
(10/18/82-11/22/82)

Attention: Ms. Pamela Brown

Dear Ms. Brown:

This letter is in response to your letter of February 16, 1983 commenting on Schedule B of the above-referenced report for Californians for An Effective Congress which disclosed a contribution to the Democratic National Committee in the amount of \$50,000.

Since receiving your letter, I have looked into this contribution and have determined that it was made in error based upon a misunderstanding between the Democratic National Committee and the undersigned Committee. at the time the contribution was made, the Democratic National Committee mistakingly believed that Californians for An Effective Congress had been an authorized committee and that the contribution consisted of "excess campaign funds" as defined in Section 113.1(c) of Title 11 of the Code of Federal Regulations and that as such, the funds could be contributed to the Democratic National Committee without limit pursuant to Section 113.2(c) of Title 11 of the Code of Federal Regulations.

Upon receipt of your letter of February 16, I initiated further conversations with the Democratic National Committee during which the status of Californians for An Effective Congress was clarified with the Democratic National

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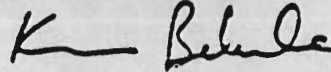
Ms. Pamela Brown
Federal Election Commission
March 7, 1983
Page Two

Committee. Based upon that clarification, the Democratic National Committee and we have concluded that the above cited sections were not applicable and the Democratic National Committee is returning to us forthwith the contribution reported in Schedule B of the above-referenced report to the extent they exceed \$15,000.

Additionally, Californians for An Effective Congress will forthwith file an amendment to the above-referenced report.

If I can provide any additional information or be of any further assistance, please do not hesitate to contact me.

Very truly yours,



KEENAN BEMPFLÉ, Treasurer
Californians for An Effective
Congress

KB/eb

85040512835
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**DEMOCRATIC
NATIONAL COMMITTEE**

1825 Massachusetts Ave., N.W. Washington, D.C. 20036

March 11, 1983

Alva Smith
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00010603

Reference: 30 Post-General Report (10/14/82-11/22/82)
Your letter dated March 2, 1983

Dear Ms. Smith:

In response to the above cited letter I am forwarding herewith adjusted Summary Page to reflect Column B totals; amended Schedule D to include purpose of each debt and corrected Schedule C, Loans to reflect correct cumulative payment to date to Citizens Bank & Trust Co. of Maryland.

Regarding the Doyle Printing debt please note the following:

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$2,828.12 on page 13, (invoice #1) which is the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82) page 164.

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$1,348.88 on page 10 (invoice #2) which should have been the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82). This invoice was paid 10/18/82, see Schedule B, page 21 of 42 (122). Amended Schedule D attached.

Due to clerical error on invoice submitted by Institutional Development Council was set up for the total amount of \$12,000 while in fact a prepayment had been made on July 6, 1982 (see August monthly report, 7/1/82-7/31/82, Schedule B, page 20 of 40 (45)).

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**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20004

March 11, 1983

Alva Smith
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00010603

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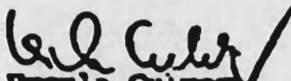
0303260000

Alva Smith
March 11, 1983
Page 2.

Final payment was made on August 25, 1982 (see September monthly report, 8/11/82-8/31/82, Schedule B, page 24 of 45. An amended schedule is attached.

The problem with respect to the \$50,000.00 transfer from Californians for an Effective Congress was previously discovered and arrangements were made for refund. See accompanying copies of letters of March 7, 1983 to the Federal Election Commission from Keenan Schale, Treasurer and related refund check in amount of \$35,000. As noted in Mr. Schale's letter, at the time the DNC received the \$50,000 transfer, the DNC understood that (1) the transferor was actually an authorized candidate committee for the McCarthy for Senate campaign, pursuant to 11 CFR § 100.5(f)(1) and (2) the funds were being transferred to the DNC as "excess campaign funds" pursuant to 11 CFR § 113.2(c). See accompanying copy of letter of October 11, 1982 from Michael Stead to the McCarthy Committee. Only when the DNC was contacted for advice by counsel for the California committee after its receipt of the February 16 FEC inquiry, did the DNC learn that the California committee, was originally formed as a McCarthy for Senate exploratory committee and subsequently became a multi-candidate committee pursuant to 11 CFR § 100.5(e)(3) rather than an authorized candidate committee.

Sincerely,


Ursula Culver
Controller

85040512838

CARB-OUT

THE CARB-OUT CHECK SYSTEM, INC.
CHARGE NUMBER

D.N.C. SERVICES CORPORATION
GENERAL FUND
1825 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

DEPOSITED WITH THE FEDERAL RESERVE BANK OF NEW YORK
NEW YORK, N.Y. 10037
MAR 15 1983

11128

March 15 1983

AMOUNT 35,000.00

DOLLARS \$ 35,000.00

Californians for an Effective Congress
1800 Avenue of Stars
Los Angeles, CA 90067

#00011128# #054001204#

#262820 5#

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF YOUR DEBIT CARD BALANCE
IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY. NO CASH REFUND

DEBIT CARD - FORM WVS-6 V-7

Refund of contribution 10/4 - 11/22/82

CARB-OUT

DEBIT CARD
CASH ON HAND

D.N.C. SERVICES CORPORATION
GENERAL FUND
1825 MASSACHUSETTS AVENUE NW.
WASHINGTON, D.C. 20036

DEBIT CARD
CASH ON HAND

11128

March 15 1983

March 15 1983

11128

PAID 35,000.00

DOLLARS \$ 35,000.00

0
1
2
3
4
5
6
7
8
9
0

Californians for an Effective Congress
1825 Avenue of Stars
Los Angeles, CA 90067

000011128 054001204 262680 5

SERVICES CORPORATION

DETACH AND RETAIN THE STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF THE DEBIT CARD
IF NOT CASHED PLEASE RETURN TO DEBIT CARD
DEBIT CARD - FORM VVB-6 V-7

Refund of contribution 10/4 - 11/22/82

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983ANALYST: Alva Smith

I. COMMITTEE: DNC Services Corporation/Democratic National Committee (C00010603)
 Ursula Culver, Acting Treasurer
 1625 Massachusetts Avenue, N.W.
 Washington, DC 20036

II. RELEVANT STATUTE: 2 U.S.C. 441a(f)

III. BACKGROUND:

Receipt of an excessive contribution from a multicandidate political committee - 2 U.S.C. 441a(f)

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed a \$50,000 contribution received from Californians for an Effective Congress ("CEC"), a multicandidate political committee. The contribution, which exceeded the limitations by \$35,000, was received on October 28, 1982 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983 requesting that the committee refund the amount in excess or amend its report (Attachment 3).*/

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 CFR 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter (Attachment 4). The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

*/ The RFAI incorrectly referred to the contribution limitation of a non-multicandidate committee.

85040512841

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE CONNECTED ORGANIZATION: DEM NAT'L CMTE TRAVEL ESCROW ACCOUNT				PARTY QUALIFIED	ID JC00010603	
1981	REQUEST FOR ADDITIONAL INFORMATION				1	81FEC/196/3490
	STATEMENT OF ORGANIZATION - AMENDMENT			17MAR81	3	81FEC/192/4123
	MISCELLANEOUS REPORT			7MAY81 TO FEC	3	81FEC/195/2917
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY81	2	81FEC/195/2801
	MISCELLANEOUS REPORT			8JUN81 TO FLC	2	81FEC/196/5297
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUN81	3	81FEC/197/1107
	MISCELLANEOUS REPORT			18JUN81 TO FEC	2	81HSE/202/0090
	PRE-SPECIAL	1,106,322	1,154,621	1JAN81 -29APR81	114	81FEC/195/2803
	PRE-SPECIAL	238,794	389,282	9JUN81 -30JUN81	61	82FEC/238/3042
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	426	82FEC/235/4063
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	9	82FEC/239/0312
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	1	82FLC/236/0574
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/0289
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/2903
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -29APR81	3	82FEC/234/0336
	REQUEST FOR ADDITIONAL INFORMATION			9JUN81 -30JUN81	4	82FEC/234/0342
	REQUEST FOR ADDITIONAL INFORMATION 2ND			9JUN81 -30JUN81	4	82FEC/237/2170
	POST-RUN-OFF	413,327	413,308	30APR81 - 8JUN81	62	81FEC/197/2337
	POST-RUN-OFF	330,754	327,444	1JUL81 -27JUL81	50	81FEC/203/3583
	POST-RUN-OFF	179,904	174,716	28JUL81 -10AUG81	51	81FEC/204/4437
	POST-RUN-OFF - AMENDMENT	-	-	30APR81 - 8JUN81	4	82FEC/235/2734
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	5	82FEC/235/2738
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	1	82FEC/236/0573
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	3	82FEC/235/2744
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	6	82FEC/235/2747
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	1	82FEC/236/0572
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	5	82FEC/239/0300
	REQUEST FOR ADDITIONAL INFORMATION			30APR81 - 8JUN81	1	82FEC/234/0340
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -27JUL81	2	82FEC/234/0347
	REQUEST FOR ADDITIONAL INFORMATION			28JUL81 -10AUG81	5	82FLC/234/0350
	YEAR-END	3,918,382	3,502,156	11AUG81 -31DEC81	240	82FEC/221/2062
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/235/2753
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	3	82FEC/235/2760
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	1	82FEC/236/0571
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/239/0305
	REQUEST FOR ADDITIONAL INFORMATION			11AUG81 -31DEC81	2	82FEC/234/0356
1982	STATEMENT OF ORGANIZATION - AMENDMENT			8JAN82	3	82FEC/212/1004
	MISCELLANEOUS REPORT			11JAN82 FROM FEC	1	82FEC/212/1072
	MISCELLANEOUS REPORT			11JAN82 TO FLC	2	82FEC/212/2472
	DEBT SETTLEMENT STATEMENT			20APR82	1	82FEC/244/4948
	MISCELLANEOUS REPORT			3JUN82 TO FEC	4	82FEC/232/3160
	MISCELLANEOUS REPORT			8JUL82 FROM FEC	1	82FEC/235/0523
	MISCELLANEOUS REPORT			20JUL82 TO FEC	2	82FEC/239/0287
	DEBT SETTLEMENT STATEMENT			20JUL82	4	82FEC/238/3642

ATTACHMENT 3

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (1) 8 4 0 5 (1) 2 8 4 3

PAGE 1

PARTY RELATION

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILE COVERAGE MATCH	# OF PAGES	RECORD FILE LOCATION
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE				PARTY QUALIFIED		ID JC00010603
CONNECTED ORGANIZATION: DEM NAT'L CMTL TRAVEL ESCROW ACCOUNT						
1981	REQUEST FOR ADDITIONAL INFORMATION					1 01FEC/194/3490
	STATEMENT OF ORGANIZATION - AMENDMENT			17MAR81	3	01FEC/192/4123
	MISCELLANEOUS REPORT			7MAY81 TO FEC	3	01FEC/195/2917
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY81	2	01FEC/195/2801
	MISCELLANEOUS REPORT			8JUN81 TO FLC	2	01FEC/196/5297
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUN81	3	01FEC/197/1107
	MISCELLANEOUS REPORT			18JUN81 TO FEC	2	01FEC/202/0097
	PRE-SPECIAL	1,104,322	1,154,621	1JAN81 -27APR81	114	01FEC/195/2801
	PRE-SPECIAL	238,794	389,202	9JUN81 -30JUN81	41	01FEC/196/3042
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -27APR81	424	02FEC/235/4043
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -27APR81	9	02FEC/239/0312
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	1	02FLC/234/0574
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	02FEC/239/0209
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	02FEC/239/2903
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -27APR81	3	02FEC/234/0334
	REQUEST FOR ADDITIONAL INFORMATION			9JUN81 -30JUN81	4	02FEC/234/0342
	REQUEST FOR ADDITIONAL INFORMATION 2ND			9JUN81 -30JUN81	4	02FEC/237/2170
	POST-RUN-OFF	413,327	413,300	30APR81 - 8JUN81	42	01FEC/197/2337
	POST-RUN-OFF	330,754	327,444	1JUL81 -27JUL81	50	01FEC/203/3503
	POST-RUN-OFF	179,904	124,716	28JUL81 -10AUG81	51	01FEC/204/4437
	POST-RUN-OFF - AMENDMENT	-	-	30APR81 - 8JUN81	4	02FEC/235/2734
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	5	02FEC/235/2730
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	1	02FEC/236/0573
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	3	02FEC/235/2744
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	4	02FEC/235/2747
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	1	02FLC/236/0572
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	5	02FEC/239/0300
	REQUEST FOR ADDITIONAL INFORMATION			30APR81 - 8JUN81	1	02FEC/234/0347
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -27JUL81	2	02FEC/234/0347
	REQUEST FOR ADDITIONAL INFORMATION			28JUL81 -10AUG81	5	02FLC/234/0356
	YEAR-END	3,910,302	3,502,156	11AUG81 -31DEC81	240	02FLC/221/2042
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	02FEC/235/2753
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	3	02FEC/235/2760
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	1	02FEC/236/0571
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	02FEC/239/0305
	REQUEST FOR ADDITIONAL INFORMATION			11AUG81 -31DEC81	2	02FEC/234/0356
1982	STATEMENT OF ORGANIZATION - AMENDMENT			8JAN82	3	02FEC/212/1004
	MISCELLANEOUS REPORT			11JAN82 FROM FEC	1	02FEC/212/1872
	MISCELLANEOUS REPORT			11JAN82 TO FLC	2	02FLC/212/2472
	DEBT SETTLEMENT STATEMENT			20APR82	1	02FLC/244/4740
	MISCELLANEOUS REPORT			3JUN82 TO FEC	4	02FEC/232/3160
	MISCELLANEOUS REPORT			8JUN82 FROM FEC	1	02FEC/235/0523
	MISCELLANEOUS REPORT			20JUN82 TO FEC	2	02FEC/239/0207
	DEBT SETTLEMENT STATEMENT			20JUN82	4	02FEC/238/3642

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	PAGE OF PAGES	MICROFILM LOCATION
	JULY MONTHLY - AMENDMENT	-	-	1.NM82 -30.NM82	23	82FEC/242/0931
	JULY MONTHLY - AMENDMENT	-	-	1.NM82 -30.NM82	4	82FEC/245/1083
	JULY MONTHLY - AMENDMENT	-	-	1.NM82 -30.NM82	1	83FEC/267/1166
	REQUEST FOR ADDITIONAL INFORMATION			1.NM82 -30.NM82	1	82FEC/244/1912
	AUGUST MONTHLY	754,554	1,236,684	1.NM82 -31.JUL82	117	82FEC/241/1553
	AUGUST MONTHLY - AMENDMENT	754,554	1,236,684	1.NM82 -31.JUL82	3	82FEC/241/4562
	AUGUST MONTHLY - AMENDMENT	-	-	1.NM82 -31.JUL82	4	82FEC/242/7865
	AUGUST MONTHLY - AMENDMENT	-	-	1.NM82 -31.JUL82	8	83FEC/260/3547
	AUGUST MONTHLY - AMENDMENT	-	-	1.NM82 -31.JUL82	1	83FEC/267/1167
	REQUEST FOR ADDITIONAL INFORMATION			1.NM82 -31.JUL82	2	82FEC/260/0500
	SEPTEMBER MONTHLY	1,044,992	1,006,992	1.AUG82 -31.AUG82	111	82FEC/244/6199
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	14	83FEC/260/3850
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	2	83FEC/260/3948
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	237	83FEC/263/6489
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	56	83FEC/115/3091
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	1	83FEC/267/1168
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1.AUG82 -31.AUG82	12	83FEC/269/1421
	REQUEST FOR ADDITIONAL INFORMATION			1.AUG82 -31.AUG82	4	82FEC/260/0495
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1.AUG82 -31.AUG82	2	83FEC/261/3263
	REQUEST FOR ADDITIONAL INFORMATION			1.AUG82 -31.AUG82	1	83FEC/267/3244
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1.AUG82 -31.AUG82	2	83FEC/269/0390
	OCTOBER MONTHLY	804,907	797,417	1.SEP82 -30.SEP82	127	82FEC/250/2318
	OCTOBER MONTHLY - AMENDMENT	804,907	797,417	1.SEP82 -30.SEP82	25	82FEC/253/0480
	OCTOBER MONTHLY - AMENDMENT	804,907	797,417	1.SEP82 -30.SEP82	22	82FEC/256/1909
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	7	83FEC/262/1150
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	1	83FEC/265/4927
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	462	83FEC/266/1401
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	15	83FEC/266/3293
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	1	83FEC/267/1169
	OCTOBER MONTHLY - AMENDMENT	-	-	1.SEP82 -30.SEP82	1	83FEC/269/1591
	REQUEST FOR ADDITIONAL INFORMATION			1.SEP82 -30.SEP82	4	83FEC/261/0621
	REQUEST FOR ADDITIONAL INFORMATION			1.SEP82 -30.SEP82	1	83FEC/261/0626
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1.SEP82 -30.SEP82	2	83FEC/265/3519
	REQUEST FOR ADDITIONAL INFORMATION			1.SEP82 -30.SEP82	1	83FEC/267/3973
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1.SEP82 -30.SEP82	1	83FEC/269/0740
	PRE-GENERAL	566,114	444,771	1.OCT82 -13.OCT82	85	82FEC/253/0691
	PRE-GENERAL - AMENDMENT	566,114	444,771	1.OCT82 -13.OCT82	22	82FEC/256/3887
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	47	82FEC/259/4423
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	4	83FEC/262/4609
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	3	83FEC/265/3587
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	3	83FEC/265/5173
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	26	83FEC/267/0608
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	1	83FEC/267/1170
	PRE-GENERAL - AMENDMENT	-	-	1.OCT82 -13.OCT82	369	83FEC/267/3516
	REQUEST FOR ADDITIONAL INFORMATION			1.OCT82 -13.OCT82	3	83FEC/262/0480
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1.OCT82 -13.OCT82	1	83FEC/266/1099
	REQUEST FOR ADDITIONAL INFORMATION			1.OCT82 -13.OCT82	1	83FEC/266/3002
	POST-GENERAL	1,410,286	1,498,042	14.OCT82 -22.NOV82	178	82FEC/256/3932

POKLY KILLER

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	RECORDING LOCATION
	DEBT SETTLEMENT STATEMENT			20JUL82	8	02FEC/238/3646
	MISCELLANEOUS REPORT			3AUG82 TO FEC	3	02FEC/240/0489
	MISCELLANEOUS REPORT			19AUG82 FROM FEC	2	02FEC/241/0282
	MISCELLANEOUS REPORT			7SEP82 TO FEC	4	02FEC/242/4447
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			14SEP82	1	02FEC/243/2898
	DEBT SETTLEMENT STATEMENT			6OCT82	5	02FEC/245/2762
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			20OCT82	1	02FEC/245/3815
	FEBRUARY MONTHLY	1,025,541	1,099,684	1JAN82 -31JAN82	80	02FEC/224/1107
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	10	02FEC/240/1141
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	111	02FEC/247/2754
	FEBRUARY MONTHLY - AMENDMENT	1,025,541	1,102,149	1JAN82 -31JAN82	4	02FEC/242/3868
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31JAN82	2	02FEC/239/3973
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31JAN82	2	02FEC/241/1100
	MARCH MONTHLY	844,654	890,795	1FEB82 -28FEB82	123	02FEC/225/2585
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	02FEC/225/4543
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	02FEC/229/2397
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	12	02FEC/240/1164
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	14	02FEC/247/0315
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	1	02FEC/247/3045
	MARCH MONTHLY - AMENDMENT	844,654	888,329	1FEB82 -28FEB82	5	02FEC/242/3855
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	2	02FEC/245/2772
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	4	02FEC/254/2619
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	4	02FEC/239/3974
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB82 -28FEB82	2	02FEC/241/1103
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	1	02FEC/245/5036
	APRIL MONTHLY	879,740	833,939	1MAR82 -31MAR82	113	02FEC/229/2400
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	2	03FEC/247/0062
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	13	02FEC/240/1351
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	18	02FEC/247/0297
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	02FEC/242/3064
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	02FEC/245/3756
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	2	02FEC/239/3970
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR82 -31MAR82	2	02FEC/241/1106
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	1	02FEC/244/3487
	MAY MONTHLY	625,444	604,056	1APR82 -30APR82	80	02FEC/236/2743
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	21	02FEC/242/0278
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	5	02FEC/245/2761
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	1	03FEC/247/1164
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	2	02FEC/240/2922
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	1	02FEC/244/5038
	JUNE MONTHLY	605,793	580,181	1MAY82 -31MAY82	90	02FEC/233/2995
	JUNE MONTHLY - AMENDMENT	605,793	580,181	1MAY82 -31MAY82	25	02FEC/242/0954
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	4	02FEC/245/1079
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	1	03FEC/247/1165
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -31MAY82	2	02FEC/244/1914
	JULY MONTHLY	721,710	599,157	1JUN82 -30JUN82	112	02FEC/238/3530
	JULY MONTHLY - AMENDMENT	721,710	599,157	1JUN82 -30JUN82	3	02FEC/240/0492
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	29	02FEC/240/1112

TYPE OF FILER
COVERING DATE

[illegible]

8 5 0 4 0 5 1 2 8 4 7

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (01-82)

PAGE 4

PARTY RELATION

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POST-GENERAL	- AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/245/4703
POST-GENERAL	- AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/247/1171
POST-GENERAL	- AMENDMENT	1,410,206	1,498,042	140CT82 -22NOV82	24	83FEC/248/0800
REQUEST FOR ADDITIONAL INFORMATION				140CT82 -22NOV82	3	83FEC/247/1770
YEAR-END		742,806	929,100	23NOV82 -31DEC82	119	83FLC/243/3429
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	2	83FEC/247/1172
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/248/0297
YEAR-END	- AMENDMENT	858,756	961,953	23NOV82 -31DEC82	18	83FEC/272/1413
TOTAL		16,330,064	0 16,465,197	0	4258	TOTAL PAGES

All reports listed above have been reviewed.
 Ending cash-on-hand as of 12/31/82: \$276,011
 Outstanding debts and obligations as of 12/31/82: \$2,981,022

850A05128A1B

ITEMIZED RECEIPTS
INC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

PAGE 1 OF

NAME ADDRESS CITY ST ZIP	OCCUPATION EMPLOYER	DATE	AMT THIS PERIOD	AGGREGATE YEAR TO DATE
ACTHAI PAC 15 UNION SQ ATN YORK NY 10003		101482	35,000.00	35,000.00
AMERICAN PSIL MKRS UNION E17 14TH ST NW WASHINGTON DC 20005		101482	35,000.00	35,000.00
AVEN FUND FOR RESPONSIBLE GOVERNMENT 9 W 57TH ST NEW YORK NY 10019		102182	3100.00	3100.00
BERNIE FRANK FOR CONGRESS COMMITTEE 1617 BEEKMAN ST BROOKLYN MA 02146		102182	33,000.00	33,000.00
CALIFORNIANS FOR AN EFFECTIVE CONGRESS - 500 1600 AVE OF STARS LOS ANGELES CA 90067		102082	350,000.00	350,000.00
CITIZENS FOR LOMLEY P O BOX 31 P PAY SINGL NY 11706		102782	35,000.00	35,050.00
COMI FOR THROUGH AGRIC PELT EDUC ASSOC MILK PROD P O BOX 32287 SAN ANTONIO TX 78284		110182	315,000.00	315,000.00
COMI OBJECTIVE NEPAESHT PACIFIC POWER FEG PAC 420 SW 6TH AVE PORTLAND OR 97204		102282	3300.00	3300.00
CENTENNIAL INSCD CO ACTIVE CITIZENSHIP CAMPAIGN P O BOX 329 DALLAS TX 75221		101482	31,500.00	31,500.00
DEMOCRATIC SENATE-13L CAPTION UNIT - ST-313 400 H CON ST NW WASHINGTON DC 20001		110182	37,500.00	37,500.00

-97-

ATTACHMENT 2)
30 Day Act-Genet

8 5 0 4 0 3 1 2 8 4 9

ITEMIZED RECEIPTS
INC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

PAGE 1 OF

NAME ADDRESS CITY ST ZIP OCCUPATION EMPLOYER DATE AMT THIS PERIOD AGGREGATE YEAR TO DATE

ACTUW PAC 15 UNION SQ NY 10003 101482 15,000.00 15,000.00

AMERICAN PSIL WORKS UNION 117 14TH ST NW DC 20005 101482 15,000.00 15,000.00

AVAN FUND FOR RESPONSIBLE GOVERNMENT 9 N 57TH ST NY 10019 102182 1100.00 1100.00

EDWIN FRANK FOR CONGRESS COMMITTEE 1617 REEFMAN ST BOSTON MA 02146 102182 13,000.00 13,000.00

CALIFORNIANS FOR AN EFFECTIVE CONGRESS - 500 1600 AVE OF STARS LOS ANGELES CA 90067 102882 150,000.00 150,000.00

CITIZENS FOR LOWMY P O BOX 21 P DAY SPRING TX 77706 102782 15,000.00 15,050.00

CEMI FOR THROUGH AGRIC MILE EDUC ASSOC HIGH PRUD P O BOX 32287 SAN ANTONIO TX 78284 110182 115,000.00 115,000.00

CEMI CO-OPERATIVE NEPAESHTA PACIFIC POWER FLD PAC 520 SW 4TH AVE PORTLAND OR 97204 102282 1300.00 1300.00

CENTRAL INSUR CO ACTIVE CITIZENSHIP CAMPAIGN P O BOX 329 FALLS TX 75221 101482 11,500.00 11,500.00

DEMOCRATIC SENATE-130 CAMPAIGN COMMITTEE - 512 312 400 N 3RD ST NW WASHINGTON DC 20001 110182 17,500.00 17,500.00

30 Day Act. Consent



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

2 March 1983

Charles E. Curry, Treasurer
DNC Services Corporation
Democratic National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Curry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the Column B totals for the Summary Page.
(2 U.S.C. 434(b))

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee established and maintained by a national political party and any affiliated committees from accepting contributions from an individual or political committee in excess of \$20,000 in a calendar year. (2 U.S.C. 441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$20,000. Please inform the Commission, in writing, of the refund and provide a photocopy of the check sent to the donor. In addition, any refund should be disclosed on Line 26(c) of Schedule B on your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

-Your report disclosed certain line number totals which have been reflected on the wrong lines of the Detailed

85040512850

X8

Summary Page. Transfers to political party committees should be properly disclosed on Schedule B, supporting Line 20 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing. (11 CFR 104.3(a) and (b))

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include purpose of each debt. (11 CFR 104.11)

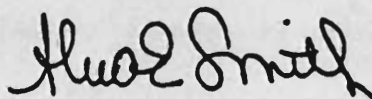
-Your calculations for cumulative payment to date on Schedule D for Citizens Bank and Trust of Maryland appear to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the omitted or corrected total(s) on the Summary Page. (11 CFR 104.3)

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Doyle Printing of \$1,348.88, while this report shows a beginning balance of \$2,828.12. (11 CFR 104.3(d))

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Institutional Development Counsel of \$6,000 while this report does not show a beginning balance. (11 CFR 104.3(d))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Alva Smith
Reports Analyst
Reports Analysis Division

85040512851

Summary Page. Transfers to political party committees should be properly disclosed on Schedule B, supporting Line 20 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing. (11 CFR 104.3(a) and (b))

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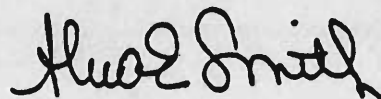
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Sincerely,



Alva Smith
Reports Analyst
Reports Analysis Division

85040512852

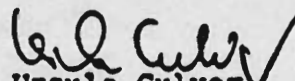
Due to clerical error on invoice submitted by Institutional Development Counsel was set up for the total amount of \$12,000 while in fact a prepayment had been made on July 6, 1982 (see August monthly report, 7/1/82-7/31/82, Schedule B, page 20 of 40 (45)).

Alva Smith
March 11, 1983
Page 2.

Final payment was made on August 25, 1982 (see September monthly report, 8/11/82-8/31/82, Schedule B, page 24 of 45. An amended schedule is attached.

The problem with respect to the \$50,000.00 transfer from Californians for an Effective Congress was previously discovered and arrangements were made for refund. See accompanying copies of letters of March 7, 1983 to the Federal Election Commission from Keenan Behrle, Treasurer and related refund check in amount of \$35,000. As noted in Mr. Behrle's letter, at the time the DNC received the \$50,000 transfer, the DNC understood that (1) the transferor was actually an authorized candidate committee for the McCarthy for Senate campaign, pursuant to 11 CFR § 100.5(f)(1) and (2) the funds were being transferred to the DNC as "excess campaign funds" pursuant to 11 CFR § 113.2(c). See accompanying copy of letter of October 11, 1982 from Michael Steed to the McCarthy Committee. Only when the DNC was contacted for advice by counsel for the California committee after its receipt of the February 16 FEC inquiry, did the DNC learn that the California committee, was originally formed as a McCarthy for Senate exploratory committee and subsequently became a multi-candidate committee pursuant to 11 CFR § 100.5(e)(3) rather than an authorized candidate committee.

Sincerely,


Ursula Culver
Controller

42

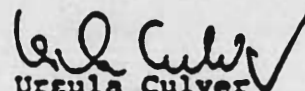
185040512854
83032680801

Alva Smith
March 11, 1983
Page 2.

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Sincerely,


Ursula Culver
Controller

48

83032680001

CARB-OUT

D.N.O. SERVICES CORPORATION
GENERAL FUND
1625 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

DEPOSITED WITH THE FEDERAL RESERVE BANK OF NEW YORK

11128

MAR 15 1983

March 15 19 83

11-12

PAYEE 35,000.00

DOLLARS \$ 35,000.00

PAY

Californians for an Effective Congress
1800 Avenue of Stars
Los Angeles, CA 90067

⑈00011128⑈ ⑆054001204⑆

⑈762880 5⑈

D.N.O. SERVICES CORPORATION

DETACH AND RETAIN THIS STATEMENT
THIS ATTACHED CHECK IS IN PAYMENT OF FUND DEPOSITED HEREIN
IF NOT CASHED PLEASE NOTIFY US IMMEDIATELY. NO CASH REFUND

DELIVER - FORM WVD-5 V-7

Refund of contribution 10/4 - 11/22/82

35040512856

83032

FEB 9 1983

HOGAN & HARTSON October 11, 1982

Mr. Michael Gage
McCarthy for Lieutenant Governor
8444 Wilshire Boulevard
Fourth Floor
Beverly Hills, CA 90211

Dear Mike:

You have requested confirmation that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000.00

The requirement promulgated by the Federal Election Commission at 11 CFR 113.2 (c) states that "excess campaign funds" may be transferred without limit to any national, state, or local committee of any political party...

"Excess campaign funds" are defined by 113.1 (e) as: amounts received by a candidate as contributions which he or she determines are in excess of any amount necessary to defray his or her campaign expenses.

In short, "excess campaign funds" are whatever the candidate says are excess. However, there is the practical limitation that a candidate must have funds to pay creditors, particularly corporate creditors, in full, before declaring any funds "excess campaign funds."

Consequently, provided that the McCarthy for Senate Committee has no outstanding obligations or has set aside funds to pay all its obligations, any additional funds may be declared excess and transferred without limit to the Democratic National Committee.

Mike, time is short and I would like to be able to effectuate a wire transfer of these funds. Please call me as soon as you receive this so that we may handle this matter forthwith. Again, thanks for your help and your support.

Sincerely,

Michael R. Steed
Counsel to the Chairman

5304051028257

NATIONAL COMMITTEE 1625 Massachusetts Ave., N.W. Washington, D.C.

FEB 9 1983

HOGAN & HARTSON October 11, 1982

Mr. Michael Gage
McCarthy for Lieutenant Governor
8444 Wilshire Boulevard
Fourth Floor
Beverly Hills, CA 90211

Dear Mike:

You have requested confirmation that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000.00

The requirement promulgated by the Federal Election Commission at 11 CFR 113.2 (c) states that "excess campaign funds" may be transferred without limit to any national, state, or local committee of any political party...

"Excess campaign funds" are defined by 113.1 (e) as: amounts received by a candidate as contributions which he or she determines are in excess of any amount necessary to defray his or her campaign expenses.

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Sincerely,

Michael R. Sted
Counsel to the Chairman

8:52 PM 10/11/82

FD FORM 284

1983 April Monthly Report

Name of Committee or Filer: <u>Democratic National Committee</u>		Report Covering the Period:	
		From: <u>1/1/83</u>	To: <u>3/31/83</u>
		Column A Total Tax Paid	Column B Contributions
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees		653,639.21	2,224,693.04
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees		79,041.21	135,259.21
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		732,680.42	2,359,952.25
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-
13. ALL LOANS RECEIVED		255,000.00	740,000.00
14. LOAN REPAYMENTS RECEIVED		-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		6,130.72	7,054.10
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-
17. OTHER RECEIPTS (Dividends, Interest, etc.)		627.03	2,329.57
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)		994,438.22	3,109,245.92
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		960,335.69	2,763,863.13
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		3,282.52	13,985.51
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		2,500.00	5,000.00
22. INDEPENDENT EXPENDITURES (Use Schedule E)		-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		-0-	5,506.62
24. LOAN REPAYMENTS MADE		52,222.22	241,666.66
25. LOANS MADE		-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		-0-	-0-
(b) Political Party Committees		35,000.00	35,000.00
(c) Other Political Committees		-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		35,000.00	35,000.00
27. OTHER DISBURSEMENTS		-0-	-0-
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)		1,053,340.43	3,065,021.92
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		732,680.42	2,359,952.25
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		35,000.00	35,000.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		697,680.42	2,324,952.25
32. TOTAL OPERATING EXPENDITURES from Line 19		960,335.69	2,763,863.13
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		6,130.72	7,054.10
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		954,204.97	2,756,809.03

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PS

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1
 (Use separate schedule for each category of the Detailed Summary Page)

Any information copied from both 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)

DNC Services Corporation/Democratic National Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Californians for Effective Congress 1850 Avenue of Stars Los Angeles, CA 90067	Refund of contribution* Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/15/83	35,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
*Per letter dated 3/2/83 covering reporting period 10/4/82-11/22/82			
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (addenda)			
TOTAL This Period (last page the line number only) 90			35000.-

195040512860
 6303270379

SCHEDULE B

ITEMIZED DISBURSEMENTS

Line 10
(Use separate statement for each category of the Detailed Summary Page)

Any information derived from such Reports and Statements may not be used 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)

DNC Services Corporation/Democratic National Committee

A. Full Name, Mailing Address and ZIP Code Californians for Effective Congress 1850 Avenue of Stars Los Angeles, CA 90067	Purpose of Disbursement Refund of contribution*	Date (month, day, year) 3/15/83	Amount of Each Disbursement This Period 35,000.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
B. Full Name, Mailing Address and ZIP Code *Per letter dated 3/2/83 covering reporting period 10/4/82-11/22/82	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (List page this line number only)

90

35000.-

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7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ursula Culver, Acting Treasurer
DNC Services Corporation
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1580

Dear Ms. Culver:

On , 1983, the Federal Election Commission determined that there is reason to believe that you and your committee violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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Ms. Ursula Culver, Acting Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

850405128663



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

F. Keenan Behrle, Treasurer
Californians for an Effective
Congress
1800 Avenue of the Stars
Suite 500
Los Angeles, California 90067

RE: MUR 1580

Dear Mr. Behrle:

On , 1983, the Federal Election Commission determined that there is reason to believe that you and your committee violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

85040512864

Mr. F. Keenan Behrle, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040512865

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Californians for an Effective Congress
F. Keenan Behrle,
Treasurer

MUR NO. 1580/1581
STAFF MEMBER & TELEPHONE NO.
Suzanne Callahan
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

850405128666
The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed the \$50,000 contribution received from Californians for an Effective Congress ("CEC"). The contribution was received on October 28, 1982. A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983, requesting that the committee refund the amount in excess or amend its report.

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request. The treasurer stated that he had

misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March 16, 1983, which included a photocopy of the repayment check.

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue here appears to have been made and accepted in violation of 2 U.S.C. § 441a.

85040512867

Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Therefore, the General Counsel recommends that the Commission find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Californians for an Effective Congress, and F. Keenan Behrle as treasurer, violated 2 U.S.C. § 441a.

85040512868

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT DNC Services
Corporation
Ursula Culver,
Treasurer

MUR NO. 1580/1581
STAFF MEMBER & TELEPHONE NO.
Suzanne Callahan
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

9 5 0 4 0 5 1 2 8 6 9
The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely.

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On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441a(a), the Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. Thus, the transaction at issue here appears to have been made and accepted in violation of 2 U.S.C. § 441a.

85040512870

Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Therefore, the General Counsel recommends that the Commission find reason to believe that DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f).

RECOMMENDATION

2. Find reason to believe the DNC Services Corporation, and Ursula Culver as treasurer, violated 2 U.S.C. § 441a(f).

85040312871

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Californians for an Effective)
Congress)

RAD Referral 83L-24a

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 12, 1983, the Commission decided by a vote of 4-0 to open a MUR with respect to the above-captioned matter.

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

Attest:

9-13-83

Date

Jody C. Ransom

for Marjorie W. Emmons
Secretary of the Commission

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

8-31-83, 12:47
9- 1-83, 11:00

85040512872



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CL*
DATE: August 31, 1983
SUBJECT: 83L-24a: Memorandum to The Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [x]
Sensitive [x]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

5040512873



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 AUG 31 P12:47

August 31, 1983

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: RAD Referral 83L-24a
Californians for an
Effective Congress

The Office of General Counsel has prepared for Commission review twelve (12) critiques of referrals from the Reports Analysis Division.

Attached to this referral is a critique prepared by this Office, a copy of the referral from the Reports Analysis Division, and a 48-hour tally vote sheet. The OGC critique summarizes the facts, presents an analysis of the legal issues involved, and makes a recommendation as to the disposition of the referrals. The copy of the RAD referral is attached for informational purposes, and the separate vote sheet provides for a vote on this referral.

Attachments
Critique and Referral

85040512874

RAD REFERRAL NUMBER: 83L-24a

SUBJECT: Californians for an Effective Congress

BACKGROUND

1. Date of referral: July 8, 1983

2. Financial background:

a. Total 1981-1982 receipts	\$ 87,168
b. Total 1981-1982 disbursements:	<u>\$141,462</u>
c. Cash on hand (12/31/82)	<u>\$ 21,525</u>
d. Debts owed to the committee (12/31/82)	<u>\$ 0</u>
e. Debts owed by the committee (12/31/82)	<u>\$ 0</u>

SUMMARY OF RAD ACTIONS

Referral category 3: (Excessive contribution to a political committee exceeding the limitations under 2 U.S.C. § 441a).

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/ Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations. 1/ A Request for Additional Information ("RAFI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely. 2/

1/ The recipient of this contribution is the subject in RAD Referral Number 83L-24b.

2/ Californians for an Effective Congress, formerly registered as McCarthy for Senate Committee, qualified as a multicandidate committee on October 19, 1980.

85040512875

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request. The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund.

An amendment was received from the DNC on March 16, 1983, which included a photocopy of the repayment check.

OGC ANALYSIS

Even though the DNC rectified the violation upon notification from the Commission, this matter involved a substantial sum of money, and the apparent violation occurred just prior to the election. Thus, we recommend that the Commission open a matter under review.

RECOMMENDATION

Open a MUR.
(Combine with 83L-24b)

Attachment
RAD Referral
13 pages



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8 July 1983

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON *[Signature]*
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON *[Signature]*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF CALIFORNIANS FOR AN EFFECTIVE CONGRESS

This is a referral of Californians for an Effective Congress. The Committee has made and received a refund of an excessive contribution, which according to the Review and Referral Procedures (Chart 3), requires further examination by your office.

A companion referral for DNC Services Corporation is being forwarded separately.

If you have any questions, please contact Pamela Brown at 357-0026.

Attachment

cc: Commissioners

85040512877

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983

ANALYST: Pamela Brown

- I. COMMITTEE: Californians for an Effective Congress
(C00108266)
F. Keenan Behrle, Treasurer
1800 Avenue of the Stars, Suite 500
Los Angeles, CA 90067
- II. RELEVANT STATUTE: 2 U.S.C. 441a(a)(2)(B)
11 CFR 110.2(a)(2)

III. BACKGROUND:

Excessive Contribution to a Political Committee

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations (Attachment 2). A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely (Attachment 3).*

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request (Attachment 4). The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

*/ Californians for an Effective Congress, formerly registered as McCarthy for Senate Committee, qualified as a multicandidate committee on October 19, 1980.

85040512878

**RAD REFERRAL TO OGC
CALIFORNIANS FOR AN EFFECTIVE CONGRESS
PAGE 2**

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund (Attachment 5).

An amendment was received from the DNC on March 16, 1983, which disclosed a photocopy of the repayment check (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

85040512879

NON-PARTY RETAIL

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILE COVERABLE PERIOD	# OF PAGES	MICROFILM LOCATION
CALIFORNIANS FOR AN EFFECTIVE CONGRESS CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		10 00010W204
1981	STATEMENT OF ORGANIZATION - AMENDMENT			15JUN81	3	01FEC/197/1821
	HALF-YEAR REPORT	3,031	12,441	1JAN81 - 30JUN81	3	01FEC/203/1708
	HALF-YEAR REPORT - AMENDMENT	-	-	1JAN81 - 30JUN81	1	02FEC/240/1408
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 - 30JUN81	2	02FEC/232/1976
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 - 30JUN81	1	02FEC/234/2970
	YEAR-END	70,700	29,714	1JUL81 - 31DEC81	10	02FEC/223/1205
	YEAR-END - AMENDMENT	70,700	29,714	1JUL81 - 31DEC81	6	02FEC/237/1529
	YEAR-END - AMENDMENT	-	-	1JUL81 - 31DEC81	3	02FEC/240/1408
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 - 31DEC81	2	02FEC/232/1977
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 - 31DEC81	3	02FEC/234/1740
1982	STATEMENT OF ORGANIZATION - AMENDMENT			4MAY82	2	02FEC/230/2609
	APRIL QUARTERLY	6,892	0	1JAN82 - 31MAR82	4	02FEC/220/0607
	JULY QUARTERLY	2,644	8,163	1APR82 - 30JUN82	6	02FEC/237/1443
	OCTOBER QUARTERLY	3,592	144	1JUL82 - 30SEP82	5	02FEC/251/1914
	PRE-GENERAL	309	25,000	1OCT82 - 13MAY82	5	02FEC/251/1919
	POST-GENERAL	0	66,000	1OCT82 - 22NOV82	4	02FEC/257/2074
	POST-GENERAL - AMENDMENT	-	-	1OCT82 - 22NOV82	3	03FEC/267/2966
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 - 22NOV82	3	03FEC/266/2325
	YEAR-END	0	0	23NOV82 - 31DEC82	3	03FEC/265/1297
	TOTAL	87,168	0 141,462	0	01	TOTAL PAGES

ALL REPORTS HAVE RECIEVED BASIC REVIEW.

Cash on Hand 12/31/82: \$21,525

Debts: -0-

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)

Californians for an Effective Congress

A. Full Name, Mailing Address and ZIP Code

Democratic Victory Fund
1731 "I" Street
Sacramento CA 95814

Purpose of Disbursement

Disbursement for: ☐ Primary ☒ General
☐ Other (specify):

Date (month,
day, year)

10/18/82

Amount of Each
Disbursement This Period

5,000

B. Full Name, Mailing Address and ZIP Code

Bosco for Congress
P.O. Box 1494
Santa Rosa CA 95402

Purpose of Disbursement

Doug Bosco 2nd C.D.
Calif.
Disbursement for: ☐ Primary ☒ General
☐ Other (specify):

Date (month,
day, year)

10/18/82

Amount of Each
Disbursement This Period

5,000

C. Full Name, Mailing Address and ZIP Code

Brown for U.S. Senate
1126 W. 6th St.
Los Angeles CA 90017

Purpose of Disbursement

Edmund G. Brown, Jr. Senate
Calif. \$5,000
Disbursement for: ☐ Primary ☒ General
☐ Other (specify):

Date (month,
day, year)

10/18/82

Amount of Each
Disbursement This Period

5,000

D. Full Name, Mailing Address and ZIP Code

Glenn Anderson Campaign Committee
5217 Hagen Rd.
Temple Hills MD

Purpose of Disbursement

Glenn Anderson 32nd C.D.
Calif.
Disbursement for: ☐ Primary ☒ General
☐ Other (specify):

Date (month,
day, year)

10/20/82

10/26/82

Amount of Each
Disbursement This Period

500

500

E. Full Name, Mailing Address and ZIP Code

Democratic National Committee
1625 Massachusetts Ave., N.W.
Washington D.C. 20036

Purpose of Disbursement

Disbursement for: ☐ Primary ☒ General
☐ Other (specify):

Date (month,
day, year)

10/19/82

Amount of Each
Disbursement This Period

50,000

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each
Disbursement This Period

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each
Disbursement This Period

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each
Disbursement This Period

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each
Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

66,000

TOTAL This Period (last page this line number only)

66,000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

16 February 1983

F. Keenan Behrle, Treasurer
Californians for An Effective
Congress
1800 Avenue of the Stars,
Suite 500
Los Angeles, CA 90067

Identification Number: C00108266

Reference: 30 Day Post-General Report (10/18/82-11/22/82)

Dear Mr. Behrle:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$15,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

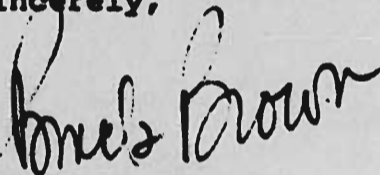
Although the Commission may take further legal steps concerning the excessive contribution(s), prompt action by you to obtain the refund of the excessive contribution will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040512882

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Brown". The signature is written in dark ink and is positioned above the typed name.

Pamela Brown
Senior Reports Analyst
Reports Analysis Division

85040512883

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Californians for an Effective Congress

COMMITTEE CONTACT: F. Keenan Behrle (213) 277-1000

DATE: 3/7/83

ANALYST: P. Brown

SUBJECT: RFAI

Mr. Behrle called in response to the RFAI. He had not thought that the contribution was excessive since he thought his committee was entitled to give their excess campaign funds to DNC Services. I explained that the provision in the Regulations was intended for authorized committees only (11 CFR 113.2). He will request a refund from DNC Services, and respond to the Commission in writing.

85040512884

PACHT, ROSS, WARNE, BERNHARD & SEARS, INC.

83 MAR 8 AM: 03

ATTORNEYS AT LAW

1800 AVENUE OF THE STARS-SUITE 800
LOS ANGELES, CALIFORNIA 90007
(213) 877-1000

March 7, 1983

FEDERAL EXPRESS

CLERK NAME: ROSS, WARNE, BERNHARD & SEARS, INC.
OF COURSE: 800 AVENUE OF THE STARS-SUITE 800
LOS ANGELES, CALIFORNIA 90007
TELEPHONE: (213) 877-1000
FAX: (213) 877-1000
E-MAIL: ROSS@PACHT.ROSS.WARNE.BERNHARD.SEARS.COM

500 MEMPHIS CENTER DR.
SUITE 200
MEMPHIS, TENN. 38104
TEL: 700-0303

Federal Election Commission
Washington, D.C. 20463

RE: Identification No.: C00108266
Reference: 30 Day Post-General Report
(10/18/82-11/22/82)

Attention: Ms. Pamela Brown

Dear Ms. Brown:

This letter is in response to your letter of February 16, 1983 commenting on Schedule B of the above-referenced report for Californians for An Effective Congress which disclosed a contribution to the Democratic National Committee in the amount of \$50,000.

Since receiving your letter, I have looked into this contribution and have determined that it was made in error based upon a misunderstanding between the Democratic National Committee and the undersigned Committee. at the time the contribution was made, the Democratic National Committee mistakenly believed that Californians for An Effective Congress had been an authorized committee and that the contribution consisted of "excess campaign funds" as defined in Section 113.1(c) of Title 11 of the Code of Federal Regulations and that as such, the funds could be contributed to the Democratic National Committee without limit pursuant to Section 113.2(c) of Title 11 of the Code of Federal Regulations.

Upon receipt of your letter of February 16, I initiated further conversations with the Democratic National Committee during which the status of Californians for An Effective Congress was clarified with the Democratic National

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3303267294

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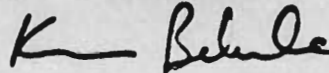
Ms. Pamela Brown
Federal Election Commission
March 7, 1983
Page Two

Committee. Based upon that clarification, the Democratic National Committee and we have concluded that the above cited sections were not applicable and the Democratic National Committee is returning to us forthwith the contribution reported in Schedule B of the above-referenced report to the extent they exceed \$15,000.

Additionally, Californians for An Effective Congress will forthwith file an amendment to the above-referenced report.

If I can provide any additional information or be of any further assistance, please do not hesitate to contact me.

Very truly yours,



KEENAN BEHRLE, Treasurer
Californians for An Effective
Congress

KB/eb

85040312886
83032572957

**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20004

March 11, 1983

Alva Smith
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00010603

Reference: 30 Post-General Report (10/14/82-11/22/82)
Your letter dated March 2, 1983

Dear Ms. Smith:

In response to the above cited letter I am forwarding herewith adjusted Summary Page to reflect Column B totals; amended Schedule D to include purpose of each debt and corrected Schedule C, Loans to reflect correct cumulative payment to date to Citizens Bank & Trust Co. of Maryland.

Regarding the Doyle Printing debt please note the following:

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$2,828.12 on page 13, (invoice #1) which is the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82) page 164.

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$1,348.88 on page 10 (invoice #2) which should have been the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82). This invoice was paid 10/18/82, see Schedule B, page 21 of 42 (122). Amended Schedule D attached.

Due to clerical error on invoice submitted by Institutional Development Council was set up for the total amount of \$12,000 while in fact a prepayment had been made on July 6, 1982 (see August monthly report, 7/1/82-7/31/82, Schedule B, page 20 of 40 (45)).

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Alva Smith
March 11, 1983
Page 2.

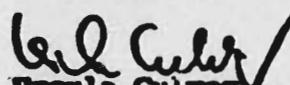
Final payment was made on August 25, 1982 (see September monthly report, 8/11/82-8/31/82, Schedule B, page 24 of 45. An amended schedule is attached.

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The problem with respect to the \$50,000.00 transfer from Californians for an Effective Congress was previously discovered and arrangements were made for refund. See accompanying copies of letters of March 7, 1983 to the Federal Election Commission from Keenan Behrle, Treasurer and related refund check in amount of \$35,000. As noted in Mr. Behrle's letter, at the time the DMC received the \$50,000 transfer, the DMC understood that (1) the transferor was actually an authorized candidate committee for the McCarthy for Senate campaign, pursuant to 11 CFR § 103.5(f)(1) and (2) the funds were being transferred to the DMC as "excess campaign funds" pursuant to 11 CFR § 113.2(c). See accompanying copy of letter of October 11, 1982 from Michael Steed to the McCarthy Committee. Only when the DMC was contacted for advice by counsel for the California committee after its receipt of the February 16 FEC inquiry, did the DMC learn that the California committee, was originally formed as a McCarthy for Senate exploratory committee and subsequently became a multi-candidate committee pursuant to 11 CFR § 103.5(e)(3) rather than an authorized candidate committee.

PS

Sincerely,


Ursula Culver
Controller

CARB-OUT
DEBIT CARD
CASH VALUE

D.N.C. SERVICES CORPORATION
GENERAL FUND
1825 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

DEBIT CARD
NO. 11128
DATE 3/15/83

11128

March 15 1983

PAID 35000000

DOLLARS \$ 35,000.00

Californians for an Effective Congress
1800 Avenue of Stars
Los Angeles, CA 90067

#00011128# #054001204#

#262820 5#

SERVICES CORPORATION

DETACH AND RETURN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF YOUR DEBITED DOLLARS
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO REFUND GIVEN.
DELLINE - FORM WVS-6 V-7

Refund of contribution 10/4 - 11/22/82



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8 July 1983

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON *[Signature]*
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON *[Signature]*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF CALIFORNIANS FOR AN EFFECTIVE CONGRESS

This is a referral of Californians for an Effective Congress. The Committee has made and received a refund of an excessive contribution, which according to the Review and Referral Procedures (Chart 3), requires further examination by your office.

A companion referral for DNC Services Corporation is being forwarded separately.

If you have any questions, please contact Pamela Brown at 357-0026.

Attachment

cc: Commissioners

05040512890

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983

ANALYST: Pamela Brown

- I. COMMITTEE: Californians for an Effective Congress
(C00108266)
F. Keenan Behrle, Treasurer
1800 Avenue of the Stars, Suite 500
Los Angeles, CA 90067
- II. RELEVANT STATUTE: 2 U.S.C. 441a(a)(2)(B)
11 CFR 110.2(a)(2)

III. BACKGROUND:

Excessive Contribution to a Political Committee

The 1982 30 Day Post-General Election Report filed by the Californians for an Effective Congress ("CEC") disclosed a contribution of \$50,000 made to DNC Services Corporation/Democratic National Committee ("DNC") on October 19, 1982, a total of \$35,000 in excess of the limitations (Attachment 2). A Request for Additional Information ("RFAI") was mailed on February 16, 1983, advising the CEC to obtain a refund of the excessive amount, or amend its report if the transaction was disclosed incorrectly or incompletely (Attachment 3).*

The CEC's treasurer contacted a staff member in the Reports Analysis Division ("RAD") by phone on March 7, 1983, in response to the Commission's request (Attachment 4). The treasurer stated that he had misunderstood the provision in the Act and Regulations concerning excess campaign funds, and had been under the impression that the contribution would not be considered excessive. He said that he would obtain a refund, and respond to the Commission's request as soon as possible.

*/ Californians for an Effective Congress, formerly registered as McCarthy for Senate Committee, qualified as a multicandidate committee on October 19, 1980.

85040512891

**RAD REFERRAL TO OGC
CALIFORNIANS FOR AN EFFECTIVE CONGRESS
PAGE 2**

In a response received on March 8, 1983, the treasurer confirmed the content of the telephone conversation, and stated that the CEC had requested a refund (Attachment 5).

An amendment was received from the DNC on March 16, 1983, which disclosed a photocopy of the repayment check (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

85040312892

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CALIFORNIANS FOR AN EFFECTIVE CONGRESS CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		IN #C00100206
1981	STATEMENT OF ORGANIZATION - AMENDMENT			15JUN81	3	W1FEC/197/1351
	110-YEAR REPORT	3,031	17,441	1JAN81 - 30JUN81	5	W1FEC/203/1/00
	110-YEAR REPORT - AMENDMENT	-	-	1JAN81 - 30JUN81	1	W2FEC/240/1400
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 - 30JUN81	7	W2FEC/232/3916
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 - 30JUN81	1	W2FEC/234/2910
	YEAR-END	70,700	29,714	1JUL81 - 31DEC81	10	W2FEC/223/1205
	YEAR-END - AMENDMENT	70,700	29,714	1JUL81 - 31DEC81	6	W2FEC/237/3529
	YEAR-END - AMENDMENT	-	-	1JUL81 - 31DEC81	3	W2FEC/240/1400
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 - 31DEC81	2	W2FEC/232/3917
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 - 31DEC81	5	W2FEC/234/1140
1982	STATEMENT OF ORGANIZATION - AMENDMENT			4MAY82	2	W2FEC/230/2669
	APRIL QUARTERLY	6,892	0	1JAN82 - 31MAR82	4	W2FEC/220/0001
	JULY QUARTERLY	2,644	W,163	1APR82 - 30JUN82	6	W2FEC/237/5443
	OCTOBER QUARTERLY	3,592	144	1JUL82 - 30SEP82	5	W2FEC/231/1914
	PRE-GENERAL	309	25,000	1OCT82 - 13MAY82	5	W2FEC/251/1919
	POST-GENERAL	0	66,000	1NOV82 - 22NOV82	4	W2FEC/257/2014
	POST-GENERAL - AMENDMENT	-	-	1NOV82 - 22NOV82	3	W3FEC/267/2906
	REQUEST FOR ADDITIONAL INFORMATION			1NOV82 - 22NOV82	3	W3FEC/266/2525
	YEAR-END	0	0	21NOV82 - 31DEC82	3	W3FEC/265/1291
TOTAL		W,168	0 141,462	0	81	TOTAL PAGES

ALL REPORTS HAVE RECIEVED BASIC REVIEW.

Cash on Hand 12/31/82: \$21,525

Debts: -0-

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)

Californians for an Effective Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Victory Fund 1731 "I" Street Sacramento CA 95814	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bosco for Congress P.O. Box 1494 Santa Rosa CA 95402	Doug Bosco 2nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Brown for U.S. Senate 1126 W. 6th St. Los Angeles CA 90017	Edmund G. Brown, Jr. Senate Calif. \$5,000 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/82	5,000
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Glenn Anderson Campaign Committee 5217 Hagen Rd. Temple Hills MD	Glenn Anderson 32nd C.D. Calif. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/20/82 10/26/82	500 500
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic National Committee 1625 Massachusetts Ave., N.W. Washington D.C. 20036	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/19/82	50,000
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			66,000
TOTAL This Period (last page this line number only)			66,000

852033128940



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

16 February 1983

F. Keenan Behrle, Treasurer
Californians for An Effective
Congress
1800 Avenue of the Stars,
Suite 500
Los Angeles, CA 90067

Identification Number: C00108266

Reference: 30 Day Post-General Report (10/18/82-11/22/82)

Dear Mr. Behrle:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a multicandidate committee from making a contribution to a political committee established and maintained by a national political party and any affiliated committee in excess of \$15,000 in a calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$15,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

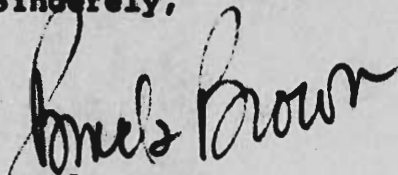
Although the Commission may take further legal steps concerning the excessive contribution(s), prompt action by you to obtain the refund of the excessive contribution will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040512895

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Brown". The signature is written in dark ink and is positioned above the typed name.

Pamela Brown
Senior Reports Analyst
Reports Analysis Division

85040512896

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Californians for an Effective Congress

COMMITTEE CONTACT: F. Keenan Behrle (213) 277-1000

DATE: 3/7/83

ANALYST: P. Brown

SUBJECT: RFAI

Mr. Behrle called in response to the RFAI. He had not thought that the contribution was excessive since he thought his committee was entitled to give their excess campaign funds to DNC Services. I explained that the provision in the Regulations was intended for authorized committees only (11 CFR 113.2). He will request a refund from DNC Services, and respond to the Commission in writing.

85040512897

ATTORNEYS AT LAW

1808 AVENUE OF THE STARS-SUITE 800
LOS ANGELES, CALIFORNIA 90067
12131 877-1000

March 7, 1983

FEDERAL EXPRESS

CLONE WARRING (1997)
OF COUNCIL
EDY N. ARON
JOSEPH BERNARD
DAVID M. MILLER
MARTIN J. MILLER

CABLES "DAMAGED"
"THE BIG 400-755"
"ELECTRIC (12) 503-014"

REPORT MADE ON

500 NEWPORT CENTER C.A. 2
SUITE 500
NEWPORT BEACH CALIFORNIA 92660
TEL: 706-8363

[illegible]

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Federal Election Commission
Washington, D.C. 20463

RE: Identification No.: C00108266
Reference: 30 Day Post-General Report
(10/18/82-11/22/82)

Attention: Ms. Pamela Brown

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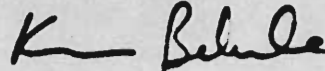
Ms. Pamela Brown
Federal Election Commission
March 7, 1983
Page Two

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If I can provide any additional information or be of any further assistance, please do not hesitate to contact me.

Very truly yours,



KEENAN BEHRLE, Treasurer
Californians for An Effective
Congress

KB/eb

85040512899
66032472951

**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036

March 11, 1983

Alva Smith
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00010603

Reference: 30 Post-General Report (10/14/82-11/22/82)
Your letter dated March 2, 1983

Dear Ms. Smith:

In response to the above cited letter I am forwarding herewith adjusted Summary Page to reflect Column B totals; amended Schedule D to include purpose of each debt and corrected Schedule C, Loans to reflect correct cumulative payment to date to Citizens Bank & Trust Co. of Maryland.

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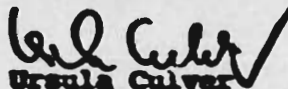
83032680800

Alva Smith
March 11, 1983
Page 2.

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Sincerely,


Ursula Culver
Controller

85040512901

CARB-OUT

DEPOSIT CHECK RETURNED FOR
CASH VALUE

D.N.C. SERVICES CORPORATION
GENERAL FUND
1825 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20006

RECEIVED DEPOSIT OF CASH VALUE

DATE 3-15-83

March 15 1983

11128

2-12-83

PAYED 35000.00

DOLLARS \$ 35,000.00

Californians for an Effective Congress
1800 Avenue of Stars
Los Angeles, CA 90067

⑈00011128⑈ ⑈054001204⑈

⑈262880 5⑈

DETACH AND RETAIN THIS STATEMENT

THIS STATEMENT IS IN PAYMENT OF YOUR DEPOSITED CASH
IF NOT CORRECT PLEASE RETURN TO DEPOSITOR, AND RETURN CASH

DELINE - FORM WVD-6 1-7

Refund of contribution 10/4 - 11/22/82

85040512902

7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 AUG 31 PI2: 47

August 31, 1983

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: RAD Referral 83L-24b
DNC Services Corporation/DNC

The Office of General Counsel has prepared for Commission review twelve (12) critiques of referrals from the Reports Analysis Division.

Attached to this referral is a critique prepared by this Office, a copy of the referral from the Reports Analysis Division, and a 48-hour tally vote sheet. The OGC critique summarizes the facts, presents an analysis of the legal issues involved, and makes a recommendation as to the disposition of the referrals. The copy of the RAD referral is attached for informational purposes, and the separate vote sheet provides for a vote on this referral.

Attachments
Critique and Referral

85040512903

RAD REFERRAL NUMBER: 83L-24b

**SUBJECT: DNC Services Corporation/
Democratic National Committee**

BACKGROUND

1. Date of referral: July 25, 1983

2. Financial background:

a. Total 1981-1982 receipts	\$ 16,330,064
b. Total 1981-1982 disbursements:	\$ 16,465,197
c. Cash on hand (12/31/82)	\$ 276,011
d. Debts owed to the committee (12/31/82)	\$ 0
e. Debts owed by the committee (12/31/82)	\$ 2,981,022

SUMMARY OF RAD ACTIONS

Referral category 3: (Receipt of contributions exceeding the limitations under 2 U.S.C. § 441a(f)).

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed a \$50,000 contribution received from Californians for an Effective Congress ("CEC"), a multicandidate political committee. 1/ The contribution, which exceeded the limitations by \$35,000, was received on October 28, 1982. A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983, requesting that the committee refund the amount in excess or amend its report. 2/

1/ The donor committee is the subject of RAD Referral Number 83L-24a.

2/ The RFAI incorrectly referred to the contribution limitation of a non-multicandidate committee.

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On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 C.F.R. § 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter. The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report.

OGC ANALYSIS

Acceptance of the \$35,000 excessive contribution appears to be a violation of 2 U.S.C. § 441a(f). Even though the respondent committee rectified the violation upon notification from the Commission, this matter involved a substantial sum of money and the apparent violation occurred just prior to the election. Thus, we recommend that the Commission open a matter under review.

RECOMMENDATION

Open a MUR.
(Combine with 83L-24a)]

Attachment
RAD Referral
15 pages



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

8 July 1983

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF THE DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE

This is a referral of the DNC Services Corporation/Democratic National Committee ("DNC"). The DNC has accepted and refunded an excessive contribution from a multicandidate political committee which, according to the Review and Referral Procedures (Chart 3), requires further examination by your office.

Please note that the DNC was referred for audit under 2 U.S.C. 438(b) on May 25, 1983, but was not approved by a vote of the Commission on June 9, 1983. Also, a companion referral of the Californians for an Effective Congress is being forwarded under a separate memorandum.

If you have any questions, please contact Alva E. Smith at 357-0026.

Attachments

cc: Commissioners

85040512906

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983ANALYST: Alva Smith

I. COMMITTEE: DNC Services Corporation/Democratic National Committee (C00010603)
Ursula Culver, Acting Treasurer
1625 Massachusetts Avenue, N.W.
Washington, DC 20036

II. RELEVANT STATUTE: 2 U.S.C. 441a(f)

III. BACKGROUND:

Receipt of an excessive contribution from a multicandidate political committee - 2 U.S.C. 441a(f)

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed a \$50,000 contribution received from Californians for an Effective Congress ("CEC"), a multicandidate political committee. The contribution, which exceeded the limitations by \$35,000, was received on October 28, 1982 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983 requesting that the committee refund the amount in excess or amend its report (Attachment 3).*/

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 CFR 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter (Attachment 4). The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

*/ The RFAI incorrectly referred to the contribution limitation of a non-multicandidate committee.

85040512907

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE CONNECTED ORGANIZATION: DEM NAT'L CMTE TRAVEL ESCROW ACCOUNT				PARTY QUALIFIED	ID #C00010603	
1981	REQUEST FOR ADDITIONAL INFORMATION					1 81FEC/196/3490
	STATEMENT OF ORGANIZATION - AMENDMENT			17MAR81	3	81FEC/192/4123
	MISCELLANEOUS REPORT			7MAY81 TO FEC	3	81FEC/195/7917
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY81	2	81FEC/195/2801
	MISCELLANEOUS REPORT			8JUN81 TO FEC	2	81FEC/196/5297
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUN81	3	81FEC/197/1107
	MISCELLANEOUS REPORT			18JUN81 TO FEC	2	81HSE/202/0091
	PRE-SPECIAL	1,106,322	1,154,621	1JAN81 -29APR81	114	81FEC/195/2803
	PRE-SPECIAL	238,794	389,282	9JUN81 -30JUN81	61	81FEC/198/3042
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	426	82FEC/235/4063
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	9	82FEC/239/0312
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	1	82FEC/236/0574
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/0289
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/2903
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -29APR81	3	82FEC/234/0336
	REQUEST FOR ADDITIONAL INFORMATION			9JUN81 -30JUN81	4	82FEC/234/0342
	REQUEST FOR ADDITIONAL INFORMATION 2ND			9JUN81 -30JUN81	4	82FEC/237/2170
	POST-RUN-OFF	413,327	413,308	30APR81 - 8JUN81	62	81FEC/197/2337
	POST-RUN-OFF	330,754	327,444	1JUL81 -27JUL81	50	81FEC/203/3503
	POST-RUN-OFF	179,904	124,716	28JUL81 -10AUG81	51	81FEC/204/4437
	POST-RUN-OFF - AMENDMENT	-	-	30APR81 - 8JUN81	4	82FEC/235/2734
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	5	82FEC/235/2738
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	1	82FEC/236/0573
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	3	82FEC/235/2744
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	6	82FEC/235/2747
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	1	82FEC/236/0572
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	5	82FEC/239/0300
	REQUEST FOR ADDITIONAL INFORMATION			30APR81 - 8JUN81	1	82FEC/234/0340
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -27JUL81	2	82FEC/234/0347
	REQUEST FOR ADDITIONAL INFORMATION			28JUL81 -10AUG81	5	82FEC/234/0350
	YEAR-END	3,918,382	3,502,156	11AUG81 -31DEC81	240	82FEC/221/2062
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/235/2753
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	3	82FEC/235/2760
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	1	82FEC/236/0571
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/239/0305
	REQUEST FOR ADDITIONAL INFORMATION			11AUG81 -31DEC81	2	82FEC/234/0356
1982	STATEMENT OF ORGANIZATION - AMENDMENT			8JAN82	3	82FEC/212/1004
	MISCELLANEOUS REPORT			11JAN82 FROM FEC	1	82FEC/212/1872
	MISCELLANEOUS REPORT			11JAN82 TO FLC	2	82FEC/212/2472
	DEBT SETTLEMENT STATEMENT			20APR82	1	82FEC/244/4948
	MISCELLANEOUS REPORT			3JUN82 TO FEC	4	82FEC/232/3160
	MISCELLANEOUS REPORT			8JUL82 FROM FEC	1	82FEC/235/0523
	MISCELLANEOUS REPORT			20JUL82 TO FEC	2	82FEC/239/0287
	DEBT SETTLEMENT STATEMENT			20JUL82	4	82FEC/238/3642

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	DEBT SETTLEMENT STATEMENT			20JUL82	8	82FEC/238/3446
	MISCELLANEOUS REPORT			3AUG82 TO FEC	3	82FEC/240/0489
	MISCELLANEOUS REPORT			19AUG82 FROM FEC	2	82FEC/241/0202
	MISCELLANEOUS REPORT			7SEP82 TO FEC	4	82FEC/242/4447
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			16SEP82	1	82FEC/243/2090
	DEBT SETTLEMENT STATEMENT			6OCT82	5	82FEC/243/2762
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			7OCT82	1	82FEC/245/3015
	FEBRUARY MONTHLY	1,025,541	1,099,684	1JAN82 -31JAN82	80	82FEC/224/1107
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	10	82FEC/240/1141
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	111	82FEC/242/2754
	FEBRUARY MONTHLY - AMENDMENT	1,025,541	1,102,149	1JAN82 -31JAN82	4	82FEC/242/3060
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31JAN82	2	82FEC/239/3073
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31JAN82	2	82FEC/241/1100
	MARCH MONTHLY	844,654	890,795	1FEB82 -28FEB82	123	82FEC/225/2503
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	82FEC/225/2503
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	82FEC/229/2397
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	12	82FEC/240/1154
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	14	82FEC/242/0315
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	1	82FEC/242/3063
	MARCH MONTHLY - AMENDMENT	844,654	888,329	1FEB82 -28FEB82	5	82FEC/242/3055
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	2	82FEC/245/2772
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	4	82FEC/254/2610
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	4	82FEC/239/3976
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB82 -28FEB82	2	82FEC/241/1103
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	1	82FEC/244/5036
	APRIL MONTHLY	879,740	833,939	1MAR82 -31MAR82	113	82FEC/229/2400
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	2	82FEC/267/1162
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	13	82FEC/240/1151
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	10	82FEC/242/0297
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/242/3044
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/245/3754
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	2	82FEC/239/3970
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR82 -31MAR82	2	82FEC/241/1104
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	1	82FEC/244/5487
	MAY MONTHLY	625,444	604,056	1APR82 -30APR82	80	82FEC/231/2743
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	21	82FEC/242/0276
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	5	82FEC/245/2767
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	1	83FEC/267/1164
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	2	82FEC/240/2922
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	1	82FEC/244/5038
	JUNE MONTHLY	605,793	580,181	1MAY82 -31MAY82	90	82FEC/233/2995
	JUNE MONTHLY - AMENDMENT	605,793	580,181	1MAY82 -31MAY82	25	82FEC/242/0954
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	4	82FEC/245/1079
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	1	83FEC/267/1165
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -31MAY82	2	82FEC/244/1914
	JULY MONTHLY	721,718	599,157	1JUN82 -30JUN82	112	82FEC/238/3530
	JULY MONTHLY - AMENDMENT	721,718	599,157	1JUN82 -30JUN82	3	82FEC/240/0492
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	29	82FEC/240/1112

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
JULY MONTHLY	- AMENDMENT	-	-	1JUN82 -30JUN82	23	82FEC/242/0931
JULY MONTHLY	- AMENDMENT	-	-	1JUN82 -30JUN82	4	82FEC/245/1083
JULY MONTHLY	- AMENDMENT	-	-	1JUN82 -30JUN82	1	83FEC/267/1164
REQUEST FOR ADDITIONAL INFORMATION				1JUN82 -30JUN82	1	82FEC/244/1912
AUGUST MONTHLY		754,556	1,236,684	1JUL82 -31JUL82	117	82FEC/241/1553
AUGUST MONTHLY	- AMENDMENT	754,556	1,236,684	1JUL82 -31JUL82	3	82FEC/241/4562
AUGUST MONTHLY	- AMENDMENT	-	-	1JUL82 -31JUL82	4	82FEC/242/2865
AUGUST MONTHLY	- AMENDMENT	-	-	1JUL82 -31JUL82	8	83FEC/260/3547
AUGUST MONTHLY	- AMENDMENT	-	-	1JUL82 -31JUL82	1	83FEC/267/1167
REQUEST FOR ADDITIONAL INFORMATION				1JUL82 -31JUL82	2	82FEC/260/0500
SEPTEMBER MONTHLY		1,044,992	1,006,992	1AUG82 -31AUG82	111	82FEC/244/0199
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	14	83FEC/260/3553
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	2	83FEC/260/3948
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	237	83FEC/263/0489
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	56	83FEC/115/3091
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	1	83FEC/267/1168
SEPTEMBER MONTHLY	- AMENDMENT	-	-	1AUG82 -31AUG82	12	83FEC/269/1421
REQUEST FOR ADDITIONAL INFORMATION				1AUG82 -31AUG82	4	82FEC/260/0495
REQUEST FOR ADDITIONAL INFORMATION 2ND				1AUG82 -31AUG82	2	83FEC/261/3243
REQUEST FOR ADDITIONAL INFORMATION				1AUG82 -31AUG82	1	83FEC/267/3264
REQUEST FOR ADDITIONAL INFORMATION 2ND				1AUG82 -31AUG82	2	83FEC/269/0390
OCTOBER MONTHLY		804,907	797,417	1SEP82 -30SEP82	127	82FEC/250/2318
OCTOBER MONTHLY	- AMENDMENT	804,907	797,417	1SEP82 -30SEP82	25	82FEC/253/0480
OCTOBER MONTHLY	- AMENDMENT	804,907	797,417	1SEP82 -30SEP82	22	82FEC/256/3909
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	7	83FEC/262/1154
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/265/4927
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	462	83FEC/264/1401
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	15	83FEC/264/3293
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/267/1169
OCTOBER MONTHLY	- AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/269/1591
REQUEST FOR ADDITIONAL INFORMATION				1SEP82 -30SEP82	4	83FEC/261/0621
REQUEST FOR ADDITIONAL INFORMATION				1SEP82 -30SEP82	1	83FEC/261/0626
REQUEST FOR ADDITIONAL INFORMATION 2ND				1SEP82 -30SEP82	2	83FEC/265/3519
REQUEST FOR ADDITIONAL INFORMATION				1SEP82 -30SEP82	1	83FEC/267/3973
REQUEST FOR ADDITIONAL INFORMATION 2ND				1SEP82 -30SEP82	1	83FEC/269/0744
PRE-GENERAL		566,114	444,771	1OCT82 -13OCT82	85	82FEC/253/0691
PRE-GENERAL	- AMENDMENT	566,114	444,771	1OCT82 -13OCT82	22	82FEC/256/3887
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	47	82FEC/259/4423
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	4	83FEC/262/4609
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	3	83FEC/265/3587
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	3	83FEC/265/5173
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	26	83FEC/267/0608
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	1	83FEC/267/1170
PRE-GENERAL	- AMENDMENT	-	-	1OCT82 -13OCT82	369	83FEC/267/3516
REQUEST FOR ADDITIONAL INFORMATION				1OCT82 -13OCT82	3	83FEC/262/0480
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT82 -13OCT82	1	83FEC/266/1099
REQUEST FOR ADDITIONAL INFORMATION				1OCT82 -13OCT82	1	83FEC/266/3002
POST-GENERAL		1,410,286	1,498,042	14OCT82 -22NOV82	178	82FEC/256/3932

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

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PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POST-GENERAL	- AMENDMENT	-	-	14OCT82 -22NOV82	1	83FEC/265/4703
POST-GENERAL	- AMENDMENT	-	-	14OCT82 -22NOV82	1	83FEC/267/1171
POST-GENERAL	- AMENDMENT	1,410,286	1,498,042	14OCT82 -22NOV82	24	83FEC/268/0800
REQUEST FOR ADDITIONAL INFORMATION				14OCT82 -22NOV82	3	83FEC/267/1770
YEAR-END		742,806	929,100	23NOV82 -31DEC82	119	83FEC/263/3429
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	2	83FEC/267/1172
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/268/0797
YEAR-END	- AMENDMENT	858,756	961,953	23NOV82 -31DEC82	18	83FEC/272/1413
TOTAL		16,330,064	0 16,465,197	0	4256	TOTAL PAGES

All reports listed above have been reviewed.
Ending cash-on-hand as of 12/31/82: \$276,011
Outstanding debts and obligations as of 12/31/82: \$2,981,022

082500.4 10 15 11 12 79 1102

ITEMIZED RECEIPTS
DNC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

PAGE 1 OF

NAME ADDRESS CITY ST ZIP	OCCUPATION EMPLOYER	DATE	AMT THIS PERIOD	AGGREGATE YEAR TO DATE
ACTWU PAC 15 UNION SQ NEW YORK NY 10003		101482	\$5,000.00	\$5,000.00
AMERICAN PSTL MKRS UNION 817 14TH ST NW WASHINGTON DC 20005		101482	\$5,000.00	\$5,000.00
AVEN FUND FOR RESPONSIBLE GOVERNMENT 9 W 57TH ST NEW YORK NY 10019		102182	\$100.00	\$100.00
BERNIE FRANK FOR CONGRESS COMMITTEE 1617 BEEKMAN ST BROOKLYN MA 02146		102182	\$3,000.00	\$3,000.00
CALIFORNIANS FOR AN EFFECTIVE CONGRESS - 500 1600 AVE OF STARS LOS ANGELES CA 90067		102882	\$50,000.00	\$50,000.00
CITIZENS FOR LOWNEY P.O. BOX 91 P RAY SMOKE NY 11706		102782	\$5,000.00	\$5,050.00
CEMT FOR THOROUGH AGRIC PELT EDUC ASSOC MILK PROD P.O. BOX 32287 SAN ANTONIO TX 78284		110182	\$15,000.00	\$15,000.00
CEMT OBJECTIVE REPRESENT PACIFIC POWER FED PAC 520 SW 6TH AVE PORTLAND OR 97204		102282	\$300.00	\$300.00
CENTENNIAL INSCU CO ACTIVE CITIZENSHIP CAMPAIGN P.O. BOX 399 DALLAS TX 75221		101482	\$1,500.00	\$1,500.00
DEMOCRATIC SENATE-IAL CAMPAIGN CMT - STE 313 400 H CAP ST NW WASHINGTON DC 20001		110182	\$7,500.00	\$7,500.00

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(ATTACHMENT 2)
30 Day Anti-Growth



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

2 March 1983

Charles E. Curry, Treasurer
DNC Services Corporation
Democratic National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Curry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the Column B totals for the Summary Page.
(2 U.S.C. 434(b))

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee established and maintained by a national political party and any affiliated committees from accepting contributions from an individual or political committee in excess of \$20,000 in a calendar year. (2 U.S.C. 441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$20,000. Please inform the Commission, in writing, of the refund and provide a photocopy of the check sent to the donor. In addition, any refund should be disclosed on Line 26(c) of Schedule B on your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

-Your report disclosed certain line number totals which have been reflected on the wrong lines of the Detailed

85040512913

Summary Page. Transfers to political party committees should be properly disclosed on Schedule B, supporting Line 20 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing. (11 CFR 104.3(a) and (b))

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include purpose of each debt. (11 CFR 104.11)

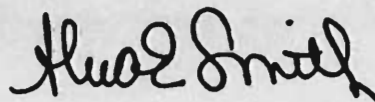
-Your calculations for cumulative payment to date on Schedule D for Citizens Bank and Trust of Maryland appear to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the omitted or corrected total(s) on the Summary Page. (11 CFR 104.3)

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Doyle Printing of \$1,348.88, while this report shows a beginning balance of \$2,828.12. (11 CFR 104.3(d))

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Institutional Development Counsel of \$6,000 while this report does not show a beginning balance. (11 CFR 104.3(d))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Alva Smith
Reports Analyst
Reports Analysis Division

85040512914

**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036

83 MAR 18 P. 11:48
FEB 7 1983

March 11, 1983

Alva Smith
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00010603

Reference: 30 Post-General Report (10/14/82-11/22/82)
Your letter dated March 2, 1983

Dear Ms. Smith:

In response to the above cited letter I am forwarding herewith adjusted Summary Page to reflect Column B totals; amended Schedule D to include purpose of each debt and corrected Schedule C, Loans to reflect correct cumulative payment to date to Citizens Bank & Trust Co. of Maryland.

Regarding the Doyle Printing debt please note the following:

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$2,828.12 on page 13, (invoice #1) which is the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82) page 164.

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$1,348.88 on page 10 (invoice #2) which should have been the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82). This invoice was paid 10/18/82, see Schedule B, page 21 of 42 (122). Amended Schedule D attached.

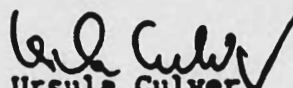
Due to clerical error on invoice submitted by Institutional Development Counsel was set up for the total amount of \$12,000 while in fact a prepayment had been made on July 6, 1982 (see August monthly report, 7/1/82-7/31/82, Schedule B, page 20 of 40 (45)).

Alva Smith
March 11, 1983
Page 2.

Final payment was made on August 25, 1982 (see September monthly report, 8/11/82-8/31/82, Schedule B, page 24 of 45. An amended schedule is attached.

The problem with respect to the \$50,000.00 transfer from Californians for an Effective Congress was previously discovered and arrangements were made for refund. See accompanying copies of letters of March 7, 1983 to the Federal Election Commission from Keenan Behrle, Treasurer and related refund check in amount of \$35,000. As noted in Mr. Behrle's letter, at the time the DNC received the \$50,000 transfer, the DNC understood that (1) the transferor was actually an authorized candidate committee for the McCarthy for Senate campaign, pursuant to 11 CFR § 100.5(f)(1) and (2) the funds were being transferred to the DNC as "excess campaign funds" pursuant to 11 CFR § 113.2(c). See accompanying copy of letter of October 11, 1982 from Michael Steed to the McCarthy Committee. Only when the DNC was contacted for advice by counsel for the California committee after its receipt of the February 16 FEC inquiry, did the DNC learn that the California committee, was originally formed as a McCarthy for Senate exploratory committee and subsequently became a multi-candidate committee pursuant to 11 CFR § 100.5(e)(3) rather than an authorized candidate committee.

Sincerely,


Ursula Culver
Controller

72

83032680801

CARB-OUT

DE LAKE CHECK PAYMENTS FOR
CASH VALUE

D.N.O. SERVICES CORPORATION
GENERAL FUND
1625 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

DC NATIONAL BANK OF CALIFORNIA NATIONAL BANK
Bank 11128

11128

March 15 1983

March 15 1983

11-12
12

PAYED 35,000.00

DOLLARS \$ 35,000.00

PAY

Californians for an Effective Congress
1800 Avenue of Stars
Los Angeles, CA 90067

9
11128
11128
11128

108

00011128 054001204 762880 5

D.N.O. SERVICES CORPORATION

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF FUND DESCRIBED BELOW.
IF NOT CORRECTLY PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DELUXE - FORM WVD-3 V-7

Refund of contribution 10/4 - 11/22/82

NATIONAL COMMITTEE 1625 Massachusetts Ave., N.W. Washington, D.C.

FEB 28 1983

HOGAN & HARTSON October 11, 1982

Mr. Michael Gage
McCarthy for Lieutenant Governor
8444 Wilshire Boulevard
Fourth Floor
Beverly Hills, CA 90211

Dear Mike:

You have requested confirmation that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000.00

The requirement promulgated by the Federal Election Commission at 11 CFR 113.2 (c) states that "excess campaign funds" may be transferred without limit to any national, state, or local committee of any political party...

"Excess campaign funds" are defined by 113.1 (e) as: amounts received by a candidate as contributions which he or she determines are in excess of any amount necessary to defray his or her campaign expenses.

In short, "excess campaign funds" are whatever the candidate says are excess. However, there is the practical limitation that a candidate must have funds to pay creditors, particularly corporate creditors, in full, before declaring any funds "excess campaign funds."

Consequently, provided that the McCarthy for Senate Committee has no outstanding obligations or has set aside funds to pay all its obligations, any additional funds may be declared excess and transferred without limit to the Democratic National Committee.

Mike, time is short and I would like to be able to effectuate a wire transfer of these funds. Please call me as soon as you receive this so that we may handle this matter forthwith. Again, thanks for your help and your support.

Sincerely,

Michael R. Steed
Counsel to the Chairman

8 1 2 9 3 1 8
5 0 3 2 5 8 10 2 9 3 1 8

Name of Committee (in Full) **DEC Services Corporation/
Democratic National Committee**

From: 3/1/83 To: 3/31/83

I. RECEIPTS		Column A Total This Period	Column B Cumulative Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	653,539.21	2,224,603.04	
(b) Political Party Committees	-0-	-0-	
(c) Other Political Committees	79,041.21	135,259.21	
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	732,680.42	2,359,862.25	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
	255,000.00	740,000.00	
13. ALL LOANS RECEIVED			
	-0-	-0-	
14. LOAN REPAYMENTS RECEIVED			
	6,130.72	7,054.10	
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
	-0-	-0-	
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
	627.08	2,329.57	
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
	994,438.22	3,109,245.92	
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)			
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
	960,335.69	2,763,863.13	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
	3,282.52	13,985.51	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
	2,500.00	5,000.00	
22. INDEPENDENT EXPENDITURES (Use Schedule E)			
	-0-	-0-	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441old) (Use Schedule F)			
	-0-	5,506.62	
24. LOAN REPAYMENTS MADE			
	52,222.22	241,666.66	
25. LOANS MADE			
	-0-	-0-	
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	
(b) Political Party Committees	35,000.00	35,000.00	
(c) Other Political Committees	-0-	-0-	
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	35,000.00	35,000.00	
27. OTHER DISBURSEMENTS			
	-0-	-0-	
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)			
	1,053,340.43	3,065,021.92	
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d			
	732,680.42	2,359,862.25	
30. TOTAL CONTRIBUTION REFUNDS from Line 28d			
	35,000.00	35,000.00	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)			
	697,680.42	2,324,862.25	
32. TOTAL OPERATING EXPENDITURES from Line 19			
	960,335.69	2,763,863.13	
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			
	6,130.72	7,054.10	
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)			
	954,204.97	2,756,809.03	

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 11/15/83
 (This schedule is required for each
 country of the United
 States)

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)

DNC Services Corporation/Democratic National Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Californians for Effective Congress 1800 Avenue of Stars Los Angeles, CA 90067	Refund of contribution* Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/15/83	35,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
*Per letter dated 3/2/83 covering reporting period 10/4/82-11/22/82			
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only) 90			35000.-

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B



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8 July 1983

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON *[Signature]*
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON *[Signature]*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF THE DNC SERVICES CORPORATION/DEMOCRATIC
NATIONAL COMMITTEE

This is a referral of the DNC Services Corporation/Democratic National Committee ("DNC"). The DNC has accepted and refunded an excessive contribution from a multicandidate political committee which, according to the Review and Referral Procedures (Chart 3), requires further examination by your office.

Please note that the DNC was referred for audit under 2 U.S.C. 438(b) on May 25, 1983, but was not approved by a vote of the Commission on June 9, 1983. Also, a companion referral of the Californians for an Effective Congress is being forwarded under a separate memorandum.

If you have any questions, please contact Alva E. Smith at 357-0026.

Attachments

cc: Commissioners

85040512921

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 July 1983ANALYST: Alva Smith

I. COMMITTEE: DNC Services Corporation/Democratic National Committee (C00010603)
Ursula Culver, Acting Treasurer
1625 Massachusetts Avenue, N.W.
Washington, DC 20036

II. RELEVANT STATUTE: 2 U.S.C. 441a(f)

III. BACKGROUND:

Receipt of an excessive contribution from a multicandidate political committee - 2 U.S.C. 441a(f)

The DNC Services Corporation/Democratic National Committee's ("DNC") 1982 30 Day Post-General Report disclosed a \$50,000 contribution received from Californians for an Effective Congress ("CEC"), a multicandidate political committee. The contribution, which exceeded the limitations by \$35,000, was received on October 28, 1982 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the DNC on March 2, 1983 requesting that the committee refund the amount in excess or amend its report (Attachment 3).*/

On March 16, 1983, the DNC responded by providing a copy of a \$35,000 refund check and by explaining that they initially thought that the funds were transferred as excess campaign funds under 11 CFR 113.2(c). According to the DNC, CEC's correct status as a multicandidate committee was not known until counsel for the CEC contacted the DNC regarding this matter (Attachment 4). The refund of the excessive amount of the contribution was confirmed by the committee's 1983 April Monthly Report (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

*/ The RFAI incorrectly referred to the contribution limitation of a non-multicandidate committee.

2
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PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE CONNECTED ORGANIZATION: DEM NAT'L CMTL TRAVEL ESCROW ACCOUNT				PARTY QUALIFIED	ID #C00010603	
1981	REQUEST FOR ADDITIONAL INFORMATION					1 81FEC/194/3490
	STATEMENT OF ORGANIZATION -- AMENDMENT			17MAR81	3	81FEC/192/4123
	MISCELLANEOUS REPORT			7MAY81 TO FEC	3	81FEC/195/2917
	STATEMENT OF ORGANIZATION -- AMENDMENT			7MAY81	2	81FEC/195/2801
	MISCELLANEOUS REPORT			8JUN81 TO FEC	2	81FEC/196/5297
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUN81	3	81FEC/197/1107
	MISCELLANEOUS REPORT			18JUN81 TO FEC	2	81HSE/202/0090
	PRE-SPECIAL	1,106,322	1,154,621	1JAN81 -29APR81	114	81FEC/195/2803
	PRE-SPECIAL	238,794	389,282	9JUN81 -30JUN81	61	81FEC/198/3042
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	426	82FEC/235/4063
	PRE-SPECIAL - AMENDMENT	-	-	1JAN81 -29APR81	9	82FEC/239/0312
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	1	82FEC/234/0574
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/0289
	PRE-SPECIAL - AMENDMENT	-	-	9JUN81 -30JUN81	11	82FEC/239/2903
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -29APR81	3	82FEC/234/0334
	REQUEST FOR ADDITIONAL INFORMATION			9JUN81 -30JUN81	4	82FEC/234/0342
	REQUEST FOR ADDITIONAL INFORMATION 2ND			9JUN81 -30JUN81	4	82FEC/237/2170
	POST-RUN-OFF	413,327	413,308	30APR81 - 8JUN81	62	81FEC/197/2337
	POST-RUN-OFF	330,754	327,444	1JUL81 -27JUL81	50	81FEC/203/3583
	POST-RUN-OFF	179,984	124,716	28JUL81 -10AUG81	51	81FEC/204/4437
	POST-RUN-OFF - AMENDMENT	-	-	30APR81 - 8JUN81	4	82FEC/235/2734
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	5	82FEC/235/2738
	POST-RUN-OFF - AMENDMENT	-	-	1JUL81 -27JUL81	1	82FEC/236/0573
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	3	82FEC/235/2744
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	6	82FEC/235/2747
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	1	82FEC/236/0572
	POST-RUN-OFF - AMENDMENT	-	-	28JUL81 -10AUG81	5	82FEC/239/0300
	REQUEST FOR ADDITIONAL INFORMATION			30APR81 - 8JUN81	1	82FEC/234/0340
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -27JUL81	2	82FEC/234/0347
	REQUEST FOR ADDITIONAL INFORMATION			28JUL81 -10AUG81	5	82FEC/234/0350
	YEAR-END	3,918,382	3,502,156	11AUG81 -31DEC81	240	82FEC/221/2062
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/235/2753
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	3	82FEC/235/2740
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	1	82FEC/236/0571
	YEAR-END - AMENDMENT	-	-	11AUG81 -31DEC81	7	82FEC/239/0305
	REQUEST FOR ADDITIONAL INFORMATION			11AUG81 -31DEC81	2	82FEC/234/0356
1982	STATEMENT OF ORGANIZATION - AMENDMENT			8JAN82	3	82FEC/212/1004
	MISCELLANEOUS REPORT			11JAN82 FROM FEC	1	82FEC/212/1872
	MISCELLANEOUS REPORT			11JAN82 TO FEC	2	82FEC/212/2472
	DEBT SETTLEMENT STATEMENT			20APR82	1	82FEC/244/4948
	MISCELLANEOUS REPORT			3JUN82 TO FEC	4	82FEC/232/3160
	MISCELLANEOUS REPORT			8JUL82 FROM FEC	1	82FEC/235/0523
	MISCELLANEOUS REPORT			20JUL82 TO FEC	2	82FEC/239/0287
	DEBT SETTLEMENT STATEMENT			20JUL82	4	82FEC/238/3442

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	DEBT SETTLEMENT STATEMENT			20JUL82	8	82FEC/238/3646
	MISCELLANEOUS REPORT			3AUG82 TO FEC	3	82FEC/240/0489
	MISCELLANEOUS REPORT			19AUG82 FROM FEC	2	82FEC/241/0282
	MISCELLANEOUS REPORT			7SEP82 TO FEC	4	82FEC/242/4447
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			16SEP82	1	82FEC/243/2898
	DEBT SETTLEMENT STATEMENT			6OCT82	5	82FEC/245/2762
	ACKNOWLEDGEMENT OF RECEIPT OF DEBT SETTLEMENT STATEMENT			7OCT82	1	82FEC/245/3815
	FEBRUARY MONTHLY	1,025,541	1,099,684	1JAN82 -31JAN82	80	82FEC/224/1107
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	10	82FEC/240/1141
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN82 -31JAN82	111	82FEC/242/2754
	FEBRUARY MONTHLY - AMENDMENT	1,025,541	1,102,149	1JAN82 -31JAN82	4	82FEC/242/3860
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31JAN82	2	82FEC/239/3973
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31JAN82	2	82FEC/241/1100
	MARCH MONTHLY	844,654	890,795	1FEB82 -28FEB82	123	82FEC/225/2583
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	82FEC/225/4563
	MARCH MONTHLY - AMENDMENT	844,654	890,795	1FEB82 -28FEB82	3	82FEC/229/2397
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	12	82FEC/240/1164
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	14	82FEC/242/0315
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	1	82FEC/242/3065
	MARCH MONTHLY - AMENDMENT	844,654	888,329	1FEB82 -28FEB82	5	82FEC/242/3855
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	2	82FEC/245/2772
	MARCH MONTHLY - AMENDMENT	-	-	1FEB82 -28FEB82	4	82FEC/254/2610
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	4	82FEC/239/3974
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB82 -28FEB82	2	82FEC/241/1103
	REQUEST FOR ADDITIONAL INFORMATION			1FEB82 -28FEB82	1	82FEC/244/5036
	APRIL MONTHLY	879,740	833,939	1MAR82 -31MAR82	113	82FEC/229/2400
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	2	83FEC/267/1162
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	13	82FEC/240/1151
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	18	82FEC/242/0297
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/242/3064
	APRIL MONTHLY - AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/245/3756
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	2	82FEC/239/3970
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR82 -31MAR82	2	82FEC/241/1106
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	1	82FEC/244/5487
	MAY MONTHLY	625,444	604,056	1APR82 -30APR82	80	82FEC/231/2743
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	21	82FEC/242/0276
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	5	82FEC/245/2767
	MAY MONTHLY - AMENDMENT	-	-	1APR82 -30APR82	1	83FEC/267/1164
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	2	82FEC/240/2922
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	1	82FEC/244/5038
	JUNE MONTHLY	605,794	580,181	1MAY82 -31MAY82	90	82FEC/233/7995
	JUNE MONTHLY - AMENDMENT	605,794	580,181	1MAY82 -31MAY82	25	82FEC/242/0954
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	4	82FEC/245/1079
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	1	83FEC/267/1165
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -31MAY82	2	82FEC/244/1914
	JULY MONTHLY	721,718	599,157	1JUN82 -30JUN82	112	82FEC/238/3530
	JULY MONTHLY - AMENDMENT	721,718	599,157	1JUN82 -30JUN82	3	82FEC/240/0492
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	29	82FEC/240/1112

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	23	82FEC/242/0931
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	4	82FEC/245/1083
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	1	83FEC/267/1166
	REQUEST FOR ADDITIONAL INFORMATION			1JUN82 -30JUN82	1	82FEC/244/1912
	AUGUST MONTHLY	754,554	1,236,684	1JUL82 -31JUL82	117	82FEC/241/1553
	AUGUST MONTHLY - AMENDMENT	754,554	1,236,684	1JUL82 -31JUL82	3	82FEC/241/4562
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 -31JUL82	4	82FEC/242/2845
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 -31JUL82	8	83FEC/260/3547
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 -31JUL82	1	83FEC/267/1167
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -31JUL82	2	82FEC/260/0500
	SEPTEMBER MONTHLY	1,044,992	1,006,992	1AUG82 -31AUG82	111	82FEC/244/0199
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	14	83FEC/260/3555
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	2	83FEC/260/3948
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	237	83FEC/263/0489
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	54	83FEC/115/3091
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	1	83FEC/267/1168
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	12	83FEC/269/1421
	REQUEST FOR ADDITIONAL INFORMATION			1AUG82 -31AUG82	4	82FEC/260/0495
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG82 -31AUG82	2	83FEC/261/3263
	REQUEST FOR ADDITIONAL INFORMATION			1AUG82 -31AUG82	1	83FEC/267/1264
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG82 -31AUG82	2	83FEC/269/0390
	OCTOBER MONTHLY	804,907	797,417	1SEP82 -30SEP82	127	82FEC/250/2318
	OCTOBER MONTHLY - AMENDMENT	804,907	797,417	1SEP82 -30SEP82	25	82FEC/253/0480
	OCTOBER MONTHLY - AMENDMENT	804,907	797,417	1SEP82 -30SEP82	22	82FEC/256/3909
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	7	83FEC/262/1154
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/265/4927
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	462	83FEC/266/1401
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	15	83FEC/266/3293
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/267/1169
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/269/1591
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	4	83FEC/261/0621
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	1	83FEC/261/0626
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP82 -30SEP82	2	83FEC/265/3519
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	1	83FEC/267/3973
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP82 -30SEP82	1	83FEC/269/0744
	PRE-GENERAL	566,114	444,771	1OCT82 -13OCT82	85	82FEC/253/0491
	PRE-GENERAL - AMENDMENT	566,114	444,771	1OCT82 -13OCT82	22	82FEC/256/3887
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	47	82FEC/259/4423
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	4	83FEC/262/4609
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	3	83FEC/265/3587
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	3	83FEC/265/5173
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	26	83FEC/267/0608
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	1	83FEC/267/1170
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	369	83FEC/267/3516
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	3	83FEC/262/0480
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	1	83FEC/266/1099
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	1	83FEC/266/3002
	POST-GENERAL	1,410,286	1,498,042	14OCT82 -22NOV82	178	82FEC/256/3932

8 5 0 4 0 5 1 2 9 2 6

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

PAGE 4

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POST-GENERAL	- AMENDMENT	-	-	14OCT82 -22NOV82	1	83FEC/265/4703
POST-GENERAL	- AMENDMENT	-	-	14OCT82 -22NOV82	1	83FEC/267/1171
POST-GENERAL	- AMENDMENT	1,410,286	1,498,042	14OCT82 -22NOV82	24	83FEC/268/0800
REQUEST FOR ADDITIONAL INFORMATION				14OCT82 -22NOV82	3	83FEC/267/1770
YEAR-END		742,806	929,100	23NOV82 -31DEC82	119	83FEC/263/3429
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	2	83FEC/267/1172
YEAR-END	- AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/268/0797
YEAR-END	- AMENDMENT	858,756	961,953	23NOV82 -31DEC82	18	83FEC/272/1413
TOTAL		16,330,064	0 16,465,197	0	4258	TOTAL PAGES

All reports listed above have been reviewed.
Ending cash-on-hand as of 12/31/82: \$276,011
Outstanding debts and obligations as of 12/31/82: \$2,981,022

82500,40;5,1,2,9,2,7

ITEMIZED RECEIPTS
DNC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A LINE 11A

PAGE 1 OF

NAME ADDRESS CITY ST ZIP	OCCUPATION EMPLOYER	DATE	AMT THIS PERIOD	AGGREGATE YEAR TO DATE
ACTWU PAC 15 UNION SQ NEW YORK NY 10003		101482	\$5,000.00	\$5,000.00
AMERICAN PSTL WKRS UNION E17 14TH ST NW WASHINGTON DC 20005		101482	\$5,000.00	\$5,000.00
AVCA FUND FOR RESPONSIBLE GOVERNMENT 9 W 57TH ST NEW YORK NY 10019		102182	\$100.00	\$100.00
BERNEY FRANK FOR CONGRESS COMMITTEE 1617 BEEKMAN ST BROOKLYN MA 02146		102182	\$3,000.00	\$3,000.00
CALIFORNIANS FOR AN EFFECTIVE CONGRESS - 500 1800 AVE OF STARS LOS ANGELES CA 90067		102882	\$50,000.00	\$50,000.00
CITIZENS FOR LOWNEY P O BOX 21 P PAY SPRING NY 11706		102782	\$5,000.00	\$5,000.00
CCMT FOR THROUGH AGRIC PELT EDUC ASSOC MILK PROD P O BOX 32287 SAN ANTONIO TX 78284		110182	\$15,000.00	\$15,000.00
CCMT OBJECTIVE REPRESENT PACIFIC POWER FED PAC 920 SW 6TH AVE PORTLAND OR 97204		102282	\$300.00	\$300.00
CONFIDENTIAL ENSCO CO ACTIVE CITIZENSHIP CAMPAIGN P O BOX 309 DALLAS TX 75221		101482	\$1,500.00	\$1,500.00
DEMOCRATIC SENATE-19L CAMPAIGN COMMITTEE - STE 312 400 W CAP ST NW WASHINGTON DC 20001		110182	\$7,500.00	\$7,500.00

-96-

(ATTACHMENT 2)
30 Day Post-General



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

2 March 1983

Charles E. Curry, Treasurer
DNC Services Corporation
Democratic National Committee
1625 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00010603

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Curry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the Column B totals for the Summary Page.
(2 U.S.C. 434(b))

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee established and maintained by a national political party and any affiliated committees from accepting contributions from an individual or political committee in excess of \$20,000 in a calendar year. (2 U.S.C. 441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$20,000. Please inform the Commission, in writing, of the refund and provide a photocopy of the check sent to the donor. In addition, any refund should be disclosed on Line 26(c) of Schedule B on your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

-Your report disclosed certain line number totals which have been reflected on the wrong lines of the Detailed

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Summary Page. Transfers to political party committees should be properly disclosed on Schedule B, supporting Line 20 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing. (11 CFR 104.3(a) and (b))

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include purpose of each debt. (11 CFR 104.11)

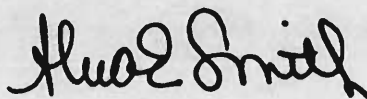
-Your calculations for cumulative payment to date on Schedule D for Citizens Bank and Trust of Maryland appear to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the omitted or corrected total(s) on the Summary Page. (11 CFR 104.3)

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Doyle Printing of \$1,348.88, while this report shows a beginning balance of \$2,828.12. (11 CFR 104.3(d))

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The 12 Day Pre-General Amendment Report shows an ending balance to Institutional Development Counsel of \$6,000 while this report does not show a beginning balance. (11 CFR 104.3(d))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Alva Smith
Reports Analyst
Reports Analysis Division

95040512929

**DEMOCRATIC
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W.

Washington, D.C. 20036

 83 MAR 18 8:48
 (202) 797-5500

March 11, 1983

Alva Smith
 Reports Analysis Division
 Federal Election Commission
 Washington, D.C. 20463

Identification Number: C00010603

Reference: 30 Post-General Report (10/14/82-11/22/82)
 Your letter dated March 2, 1983

Dear Ms. Smith:

In response to the above cited letter I am forwarding herewith adjusted Summary Page to reflect Column B totals; amended Schedule D to include purpose of each debt and corrected Schedule C, Loans to reflect correct cumulative payment to date to Citizens Bank & Trust Co. of Maryland.

Regarding the Doyle Printing debt please note the following:

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$2,828.12 on page 13, (invoice #1) which is the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82) page 164.

The 12 Day Pre-General Amendment Report submitted with letter dated December 2, 1982 shows an ending balance to Doyle Printing of \$1,348.88 on page 10 (invoice #2) which should have been the beginning balance for the 30 Day Post General Report (10/14/82-11/22/82). This invoice was paid 10/18/82, see Schedule B, page 21 of 42 (122). Amended Schedule D attached.

Due to clerical error on invoice submitted by Institutional Development Counsel was set up for the total amount of \$12,000 while in fact a prepayment had been made on July 6, 1982 (see August monthly report, 7/1/82-7/31/82, Schedule B, page 20 of 40 (45)).

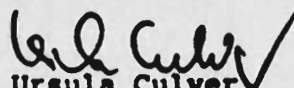
850405-12930

Alva Smith
March 11, 1983
Page 2.

Final payment was made on August 25, 1982 (see September monthly report, 8/11/82-8/31/82, Schedule B, page 24 of 45. An amended schedule is attached.

The problem with respect to the \$50,000.00 transfer from Californians for an Effective Congress was previously discovered and arrangements were made for refund. See accompanying copies of letters of March 7, 1983 to the Federal Election Commission from Keenan Behrle, Treasurer and related refund check in amount of \$35,000. As noted in Mr. Behrle's letter, at the time the DNC received the \$50,000 transfer, the DNC understood that (1) the transferor was actually an authorized candidate committee for the McCarthy for Senate campaign, pursuant to 11 CFR § 100.5(f)(1) and (2) the funds were being transferred to the DNC as "excess campaign funds" pursuant to 11 CFR § 113.2(c). See accompanying copy of letter of October 11, 1982 from Michael Steed to the McCarthy Committee. Only when the DNC was contacted for advice by counsel for the California committee after its receipt of the February 16 FEC inquiry, did the DNC learn that the California committee, was originally formed as a McCarthy for Senate exploratory committee and subsequently became a multi-candidate committee pursuant to 11 CFR § 100.5(e)(3) rather than an authorized candidate committee.

Sincerely,


Ursula Culver
Controller

#2

85040512931
03032680801

CARB-OUT
DE LAKE CHECK PRINTING CO.
CHICAGO, ILL.

D.N.C. SERVICES CORPORATION
GENERAL FUND
1635 MASSACHUSETTS AVENUE, NW.
WASHINGTON, D.C. 20036

D.C. NATIONAL BANK OF WASHINGTON
NEW YORK

11128

MAR 15 83

March 15 1983

11128

PAYED 35000.00

DOLLARS \$ 35,000.00

PAY

Californians for an Effective Congress
1900 Avenue of Stars
Los Angeles, CA 90067

9
108
108
108

⑆00011128⑆ ⑆054001204⑆

⑆762880 5⑆

D.N.C. SERVICES CORPORATION

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF YOUR DEBITED BALANCE.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO REFUND GIVEN.

DELUXE - FORM WVD-8 V-7

Refund of contribution 10/4 - 11/22/82

85040512932

8303

RECEIVED
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036

FEB 25 1983

9/2/13

HOGAN & HARTSON

October 11, 1982

Mr. Michael Gage
McCarthy for Lieutenant Governor
8444 Wilshire Boulevard
Fourth Floor
Beverly Hills, CA 90211

Dear Mike:

You have requested confirmation that the McCarthy for Senate Committee may transfer and the Democratic National Committee may accept a sum of approximately \$50,000.00

The requirement promulgated by the Federal Election Commission at 11 CFR 113.2 (c) states that "excess campaign funds" may be transferred without limit to any national, state, or local committee of any political party...

"Excess campaign funds" are defined by 113.1 (e) as: amounts received by a candidate as contributions which he or she determines are in excess of any amount necessary to defray his or her campaign expenses.

In short, "excess campaign funds" are whatever the candidate says are excess. However, there is the practical limitation that a candidate must have funds to pay creditors, particularly corporate creditors, in full, before declaring any funds "excess campaign funds."

Consequently, provided that the McCarthy for Senate Committee has no outstanding obligations or has set aside funds to pay all its obligations, any additional funds may be declared excess and transferred without limit to the Democratic National Committee.

Mike, time is short and I would like to be able to effectuate a wire transfer of these funds. Please call me as soon as you receive this so that we may handle this matter forthwith. Again, thanks for your help and your support.

Sincerely,

Michael R. Sted
Michael R. Sted
Counsel to the Chairman

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8503248082

1983 APR 11 MONTHLY REPORT
 1983 APR 11 MONTHLY REPORT
 1983 APR 11 MONTHLY REPORT

Name of Candidate or Office: Democratic National Committee		Report Covering the Period: From: 3/1/83 To: 3/31/83	
		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		653,539.21	2,221,603.04
State Entry Unfunded (\$ <u>529,216.21</u>)		-0-	-0-
(b) Political Party Committees		79,041.21	135,259.21
(c) Other Political Committees		732,680.42	2,359,862.25
(d) TOTAL CONTRIBUTIONS (other than loans from 11a, 11b and 11c)		-0-	-0-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		255,000.00	740,000.00
13. ALL LOANS RECEIVED		-0-	-0-
14. LOAN REPAYMENTS RECEIVED		6,130.72	7,054.10
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		-0-	-0-
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		627.08	2,329.57
17. OTHER RECEIPTS (Dividends, Interest, etc.)		994,438.22	3,109,245.92
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)			
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		960,335.69	2,763,863.13
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		3,282.52	13,985.51
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		2,500.00	5,000.00
22. INDEPENDENT EXPENDITURES (Use Schedule E)		-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441old) (Use Schedule F)		-0-	5,506.62
24. LOAN REPAYMENTS MADE		52,222.22	241,666.66
25. LOANS MADE		-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		-0-	-0-
(b) Political Party Committees		35,000.00	35,000.00
(c) Other Political Committees		-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		35,000.00	35,000.00
27. OTHER DISBURSEMENTS		-0-	-0-
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)		1,053,340.43	3,065,021.92
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		732,680.42	2,359,862.25
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		35,000.00	35,000.00
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		697,680.42	2,324,862.25
32. TOTAL OPERATING EXPENDITURES from Line 19		960,335.69	2,763,863.13
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		6,130.72	7,054.10
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		954,204.97	2,756,809.03

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PS

SCHEDULE B

ITEMIZED DISBURSEMENTS

Form 1 of 1
 This schedule must be filed with the return of the candidate
 (Continued on Separate Page)

Any information copied from such Filings 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)

DNC Services Corporation/Democratic National Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Californians for Effective Congress 1800 Avenue of Stars Los Angeles, CA 90067	Refund of contribution*	3/15/83	35,000.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
*Per letter dated 3/2/83 covering reporting period 10/4/82-11/22/82	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page the line number only)			35000.-

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
DNC Services Corporation/DNC)

RAD Referral 83L-24b

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 12, 1983, the Commission decided by a vote of 4-0 to open a MUR with respect to the above-captioned matter.

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

Attest:

9-13-83

Date

Jody C. Ransom

for Marjorie W. Emmons
Secretary of the Commission

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

8-31-83, 12:47
9- 1-83, 11:00

85040512936



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: August 31, 1983
SUBJECT: 83L-24b: Memorandum to The Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
below) ☐

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85040512938



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1581

Date Filmed

2/28/85

Camera No. ---

1

Cameraman

JRL