



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1684

Date Filmed 1/24/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

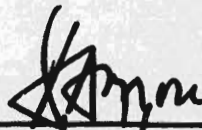
Routing Cards, Inter-off. memos

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):

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

Signed

date

  
1/17/84

85040511273

# MEMORANDUM

To: The File

From: ~~Stinson~~

Subj: Letter from Scott McMurray dated Dec. 12, 1984

Date: 1/87/85

In response to the attached letter to  
The Commission from Scott McMurray, former  
Congressman Tom Cocoran's news secretary, I  
~~subsequently~~ telephoned the former approximately  
two times. Since Cong. Cocoran left the  
campaign, his Congressional office was closed  
and Mr. McMurray could not be reached. Also,  
I attempted to ascertain Mr. McMurray's home  
phone number from directory assistance but  
it was not listed.

I informed Ken Snow of these efforts.

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84 DEC 13 AM 11:00

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OFFICE OF THE  
COMMISSION SEC

84 DEC 14 AM 11:00

mm  
1684  
Brown

GCO# 5972

503 N. Armistead, #302  
Alexandria, VA 22312

December 12, 1984

DEC 14 P 2:05

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GENERAL COUNSEL

Secretary  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

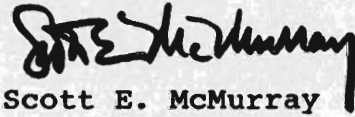
Dear Secretary:

This letter is in regard to the phrasing of the Commission's determination that a complaint merits investigation. As the enclosed articles show, the finding of "reason to believe," as the Commission now uses, is quite confusing to reporters, who misconstrue its meaning.

As news secretary to former Rep. Tom Corcoran, who is involved in the complaint which is discussed in the articles, I suggest that the Commission adopt some more accurate language to be used when referring to the decision to investigate a case. As the Chicago Tribune put it in its page-one story, the "reason to believe" determination was "a preliminary finding," though it was actually no more than a determination that the complaint was sufficiently substantive to warrant investigation -- sort of like an indictment, but certainly not the first vote to convict by a split jury.

I look forward to your response to this suggestion.

Sincerely,



Scott E. McMurray

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The entire nation of Luxembourg is smaller than Rhode Island and has a population of just 200,000, but there was no belittling the welcome accorded the

police.

Mayor Washington, who ranks as "bourgmestre" of the world's fourth-largest Luxembourg population,

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change

## Percy critic's ads a violation of election law?

By Chuck Neubauer

The Federal Election Commission has found "reason to believe" that \$278,000 spent in the Republican primary by a California real estate developer to attack Sen. Charles H. Percy violated federal election law, according to records released yesterday.

As a result of the preliminary finding, the commission is conducting a full-scale investigation of the \$278,000 spent by developer Michael Goland to oppose Percy, court records show.

The commission made its recommendation to conduct the investigation Oct. 2, five months after Percy's campaign committee filed a complaint alleging that Goland's expenditures in the March primary were illegal.

Percy beat Rep. Thomas Corcoran in the Republican primary but lost the general election to Rep. Paul Simon.

Goland, who spent an additional \$700,000 in the general election, could not

be reached for comment yesterday. He has denied any wrongdoing in the past.

U.S. District Judge John H. Pratt in Washington ordered the commission yesterday to take final action on the complaint within 30 days.

The judge criticized the FEC for its "casual handling" of the complaint, saying that "the delay in processing the complaint was unreasonable and unacceptable." He said the FEC should have finished acting on the complaint before the general election.

"If we would have had this 2½ weeks earlier, it might have had some effect on the election," said Daniel J. Swillinger, the attorney who filed the complaint and a lawsuit against the agency for the Percy committee.

The FEC is investigating Percy's charges that Goland's primary expenditures violated laws that limit individual gifts to a candidate to \$1,000. Goland has maintained that his expenditures were not subject to the limits.

## Anti-Percy spending draws federal fire

by R. Bruce Dold

one of 4 page-1 stories

THE FEDERAL Election Commission has made a preliminary finding that a California businessman and Rep. Tom Corcoran violated federal law by illegal campaign spending in the March Republican primary against Sen. Charles Percy.

If the finding is upheld, it could lead to heavy fines against Corcoran's campaign, businessman Michael Goland and a Washington, D.C., lobbyist.

U.S. District Judge John Pratt in Washington disclosed the preliminary finding Monday in an order directing the FEC to reach a decision within 30 days. Acting on a request by Percy, the judge also chided the FEC for not expediting the case.

Goland spent about \$1.1 million on a controversial billboard, radio and television advertising campaign in the primary and general elections that urged voters to dump Percy and called the incumbent a chameleon.

THE ADS were believed to be a factor in Percy's narrow loss to Rep. Paul Simon in the general election. The Percy camp had hoped for an early ruling against Goland to blunt the ads' effectiveness.

The FEC finding dealt with \$278,729 that Goland spent in

Continued on page 2, col. 4



Michael Goland

## Percy

Continued from page 1

Corcoran's unsuccessful primary campaign.

On April 26, Percy filed a complaint against Goland, Corcoran and pro-Israeli lobbyist Morris Amitay, charging that they violated federal law that prohibits an individual from contributing more than \$1,000 to a campaign and prohibits a campaign from accepting such a contribution.

Although Goland apparently made no direct contribution to Corcoran, his expenditures were made in coordination with Corcoran's campaign and Amitay, the complaint charges.

GOLAND SPENT \$800,000 in the general election. An attorney for Percy, Daniel Swillinger, said there is "no indication" of collusion be-

tween Goland and Simon.

Attempts to reach Goland for comment were unsuccessful.

According to Pratt's order, the FEC on Oct. 2 found "reason to believe" that the Goland campaign violated election laws.

The commission's preliminary finding, likened to a grand jury indictment, is the first step to a full investigation and possible fines against Corcoran's campaign, Goland and Amitay.

"THE COMMISSION has acted unreasonably on the record of this case," the order said. "It was apparent from the outset that Sen. Percy's primary and general election campaigns would be closely contested. Because Sen. Percy was a longtime incumbent and also chairman of the Senate Foreign Relations Committee, and whose re-election had an important bearing on the control of the Senate, his campaign for re-election was the

focus of tremendous national interest."

Pratt criticized the commission for making its preliminary finding five months after Percy filed his complaint.

"The congressman received a letter from the commission noting on Oct. 2, the commission has terminated that there is reason to believe the Corcoran for Senate committee accepted contributions from Michael Goland in coordination with expenditures," said Corcoran's attorney, Scott McMurray.

The court order was greeted with mixed reactions: from Percy, who had hoped a public ruling before the Nov. 6 election might further Goland's expenditures and gain the impact of the Goland case.

"It's too bad we didn't have about 2½ weeks earlier. I have shown that voters should give credibility to Mr. Goland's civility," Swillinger said.

Chicago Sun-Times 11/20/84: p. 6

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Secretary  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463



84 DEC 13 11:58

RECEIVED AT THE FEC

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Corcoran for Senate Committee ) MUR 1684  
William F. Keck, as )  
Treasurer )  
Michael Goland )  
Morris Amitay )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 18, 1984, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 1684:

1. Find no probable cause to believe the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find no probable cause to believe Michael Goland violated 2 U.S.C. § 441a(a) (1) (A).
3. Approve the letters attached to the General Counsel's report dated December 7, 1984.
4. CLOSE THE FILE.

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

Attest:

12-19-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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GCC# 5890

**MANATT, PHELPS, ROTHENBERG & TUNNEY**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

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(213) 318-4000

SAN FRANCISCO OFFICE

FOUR EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 391-7840

LOS ANGELES (DOWNTOWN)

811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-8800

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OFFICE OF THE  
GENERAL COUNSEL

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December 6, 1984

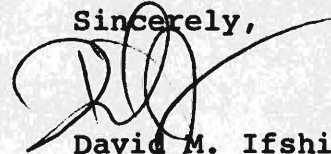
Duane A. Brown, Esq.  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Mr. Brown:

RE: MUR 1684  
Morris Amitay  
Michael Goland

Pursuant to our telephone conversation, this letter confirms that we are making no additional submissions on behalf of Mr. Amitay and Mr. Goland in the above-captioned matter. We believe that the recommendations of the Office of the General Counsel that no probable cause that a violation has occurred is correct and have no additional materials to submit beyond that contained in our previous submissions and the General Counsel's report.

Sincerely,

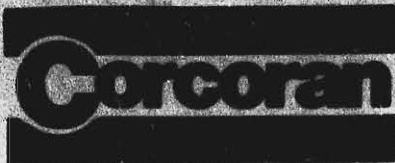


David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak

CC: Morris Amitay  
Michael Goland

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CORCORAN FOR SENATE COMMITTEE

P. O. BOX 2667 • AURORA, ILLINOIS 60507

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AM: 00

December 6, 1984

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

Dear Mr. Brown:

Pursuant to our conversation of December 5, 1984,  
the Corcoran for Senate Committee does not intend  
to respond to the General Counsel's recommendation  
of "no probable cause to believe that a violation  
has occurred."

Very truly yours,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

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OFFICE OF THE  
GENERAL COUNSEL

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**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION THE FEC  
SECRETARY

In the Matter of )

Corcoran for Senate Committee )  
William F. Keck, as treasurer )

Michael Goland )  
Morris Amitay )

84 DEC 10 P12:38  
MUR 1684

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Daniel Swillinger, Esq., filed a complaint on behalf of Senator Charles H. Percy and the Citizen for Percy '84 Committee ("the '84 Committee"). The '84 Committee alleges that Michael Goland financed a direct mail campaign against Senator Percy prior to the March 20, 1984 Illinois Republican primary. The complaint states that Mr. Goland made \$278,729 \*/ in expenditures against the Percy campaign. In addition, the '84 Committee states that Mr. Goland reported these expenditures as being independent. However, the '84 Committee's complaint attempts to demonstrate that the Goland expenditures were not independent, but were made with the cooperation and prior consent of the campaign of Representative Thomas Corcoran, Senator Percy's principal primary opponent. If this is so, the expenditures would constitute excessive contributions made by Goland and accepted by the Corcoran Committee ("the Committee") in violation of 2 U.S.C. §§ 441a(a) and 441a(f).

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\*/ The expenditures reported to date by Mr. Goland are \$419,573.

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The '84 Committee argues that Mr. Goland made his expenditures at the direction of a Morris Amitay, an individual claimed by the '84 Committee to be an agent and fundraiser for the Corcoran campaign. The '84 Committee argues that because of his alleged position with the Corcoran campaign, Mr. Amitay was aware of the campaign's plans, projects and needs. The Committee argues that because Mr. Goland's expenditures were made with the awareness of the campaign's plans, projects and needs they were not independent.

On October 2, 1984, the Commission found reason to believe the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f) for accepting an excessive contribution from Michael Goland and, found reason to believe Michael Goland violated 2 U.S.C. § 441a(a)(1)(A) for making an excessive contribution to the Corcoran campaign. Simultaneously, the Commission decided to take no action against Morris Amitay at that time and authorized the sending of interrogatories to Michael Goland, Morris Amitay and Congressman Corcoran in an effort to satisfy questions of concern.

On October 31 and after a request for an extension of time to respond, William Keck filed his response to the Commission's reason to believe finding and Congressman Corcoran filed his response to the interrogatories. On November 5, after several requests for extensions of time to respond, David Ifshin, Esq., filed responses to the interrogatories on behalf of his clients, Morris Amitay and Michael Goland.

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**II. LEGAL ANALYSIS OF RESPONDENT'S BRIEFS** (See OGC Brief of November 30, 1984)


In telephone conversations with the respondents, William Keck, treasurer of the Corcoran Committee and David M. Ifshin, Esq., representing Morris Amitay and Michael Goland, both indicated that they were satisfied with the General Counsel's analysis and that no responsive brief would be filed (See Attachments I and II).

**III. RECOMMENDATIONS**

The Office of General Counsel recommends that the Commission:

1. find no probable cause to believe the Corcoran for Senate Committee and William Keck, as treasurer violated 2 U.S.C. § 441a(f);
2. find no probable cause to believe Michael Goland violated 2 U.S.C. § 441a(a)(1)(A);
3. approve the attached letters;
4. close the file.

7 December 1984  
Date

  
Charles N. Steele  
General Counsel

**Attachments**

- I. Letter from William Keck
- II. Letter from David Ifshin, Esq.
- III. Letter to William Keck
- IV. Letter to David Ifshin, Esq.
- V. Letter to Daniel Swillinger, Esq.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 20, 1984

Daniel Swillinger, Esq.  
David & Gooch  
920 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

Re: MUR 1684

Dear Mr. Swillinger:

This is in reference to the complaint you filed with the Commission on April 26, 1984, concerning alleged violations of the Act by Michael Goland and the Corcoran for Senate Committee.

Based on your complaint, the Commission determined there was reason to believe that Michael Goland and the Corcoran for Senate Committee violated 2 U.S.C. §§ 441a(a) and 441a(f) respectively, of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter. After an investigation was conducted, and the brief of the General Counsel was considered, the Commission concluded on December 18, 1984, that there was no probable cause to believe that Michael Goland or the Corcoran for Senate Committee violated the Act. Accordingly, the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

85040511284



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 20, 1984

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Michael Goland  
Morris Amitay

Dear Mr. Ifshin:

This is to advise you that after an investigation was conducted, the Commission concluded on December 18, 1984, that there is no probable cause to believe your clients violated the Act. Accordingly the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

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

Charles N. Steele  
General Counsel

85040511285



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William F. Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 281  
Maple Avenue  
Sugar Grove, Illinois 60554

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Mr. Keck:

This is to advise you that after an investigation was conducted, the Commission concluded on December , 1984, that there is no probable cause to believe that the Corcoran for Senate Committee and you, as treasurer, violated the Act. Accordingly the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

*CS* 12/19/84

Charles N. Steele  
General Counsel

cc: The Honorable Tom Corcoran  
8736 Old Dominion Drive  
McLean, Virginia 22102

85040511286



**SENSITIVE**

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

84 NOV 30 P12:42

November 30, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

SUBJECT: MUR 1684

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on November 30, 1984. Following receipt of the respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )

Corcoran for Senate Committee )

William F. Keck, as treasurer )

MUR 1684 )

**GENERAL COUNSEL'S BRIEF**

**I. STATEMENT OF THE CASE**

8 5 0 4 0 5 1 1 2 8 3

Daniel Swillinger, Esq., filed a complaint on behalf of Senator Charles H. Percy and the Citizen for Percy '84 Committee ("the '84 Committee"). The '84 Committee alleges that Michael Goland financed a direct mail campaign against Senator Percy prior to the March 20, 1984 Illinois Republican primary. The complaint states that Mr. Goland made \$278,729 \*/ in expenditures against the Percy campaign. In addition, the '84 Committee states that Mr. Goland reported these expenditures as being independent. However, the '84 Committee's complaint attempts to demonstrate that the Goland expenditures were not independent, but were made with the cooperation and prior consent of the campaign of Representative Thomas Corcoran, Senator Percy's principal primary opponent. If this is so, the expenditures would constitute excessive contributions made by Goland and accepted by the Corcoran Committee ("the Committee") in violation of 2 U.S.C. §§ 441a(a) and 441a(f).

---

\*/ The expenditures reported to date by Mr. Goland are \$419,573.

The '84 Committee argues that Mr. Goland made his expenditures at the direction of a Morris Amitay, an individual claimed by the '84 Committee to be an agent and fundraiser for the Corcoran campaign. The '84 Committee argues that because of his alleged position with the Corcoran campaign, Mr. Amitay was aware of the campaign's plans, projects and needs. The Committee argues that because Mr. Goland's expenditures were made with the awareness of the campaign's plans, projects and needs they were not independent.

On October 2, 1984, the Commission found reason to believe the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f) for accepting an excessive contribution from Michael Goland and, found reason to believe Michael Goland violated 2 U.S.C. § 441a(a)(1)(A) for making an excessive contribution to the Corcoran campaign. Simultaneously, the Commission decided to take no action against Morris Amitay at that time and authorized the sending of interrogatories to Michael Goland, Morris Amitay and Congressman Corcoran in an effort to satisfy questions of concern.

On October 31 and after a request for an extension of time to respond, William Keck filed his response to the Commission's reason to believe finding and Congressman Corcoran filed his response to the interrogatories. On November 5, after several requests for extensions of time to respond, David Ifshin, Esq., filed responses to the interrogatories on behalf of his

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clients, Morris Amitay and Michael Goland.

II. LEGAL ANALYSIS

11 C.F.R. § 109.1(a) defines an independent expenditure as:

[a]n expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.  
(emphasis added)

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In its response to the reason to believe finding, the Committee essentially reiterates verbatim its response to the complaint. The Committee argues that Morris Amitay ("Amitay") and Michael Goland ("Goland") were not agents or authorized fundraisers of the Committee. The '84 Committee contends that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay, yet, the Committee states that, "Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee...". Moreover, the Committee argues that Amitay, "did not hold any position within the campaign organization" and that Goland did not hold a position within the campaign nor was he authorized to make expenditures on its behalf. The Committee attaches an affidavit by a Reed Wilson in support of its position. Mr. Wilson was the campaign manager of the Committee. Essentially, Mr. Wilson's affidavit reiterates the Committee's response. Mr. Wilson swears that neither Goland nor Amitay had a position with the organization, that neither individual was authorized to raise

money on behalf of the Committee and that neither the Committee nor agents or employees of the Committee cooperated or consulted with Goland. The response to the interrogatories by Congressman Corcoran further supports the Committee's position that no evidence exists to support the '84 Committee's allegations that expenditures made by Mr. Goland were made with the cooperation, prior consent, at the request of or in consultation with Congressman Corcoran or his campaign.

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Morris Amitay's response to the Commission's interrogatories reflect essentially the position taken by Mr. Amitay in his response to the complaint notification. Mr. Amitay indicates that he did not control Goland's expenditures, that he was not an agent of the Corcoran campaign and that Goland made his expenditures independent of any direction from him. Further, Amitay states that he is an attorney, and, in that capacity, has provided a varied range of services to Goland including advice regarding the legal ramifications concerning the making of independent expenditures.

Mr. Goland's response to the interrogatories continues to assert the independence of his expenditure campaign against Charles Percy. Mr. Goland avers that his independent expenditure campaign was conducted out of self-interest and was not encouraged by Tom Corcoran, anyone related to the Corcoran campaign or Morris Amitay.

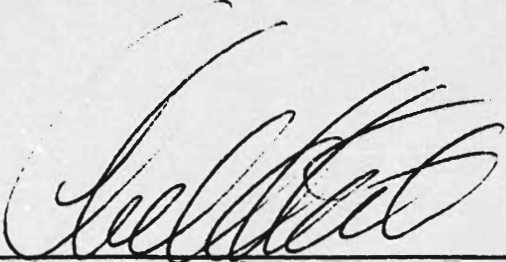
No evidence was found to exist to support the '84 Committee's allegation that the Goland expenditures were made

with the cooperation and prior consent of the Corcoran campaign. In addition, no evidence was developed to support the allegation that Mr. Amitay was aware of the Corcoran campaign's plans, projects and needs and communicated those needs to Mr. Goland, thereby nullifying the independence of Goland's expenditures.

**GENERAL COUNSEL'S RECOMMENDATION**

Based on the foregoing, it appears that there is no probable cause to believe Michael Goland made an excessive contribution to the Corcoran campaign in violation of 2 U.S.C. § 441a(a)(1)(A). Concurrently, it appears that there is no probable cause to believe the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

29 November 1984  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

85040511292

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Michael Goland

)  
)  
)

MUR 1684

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

8 5 0 4 0 5 1 1 2 9 3

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clients, Morris Amitay and Michael Goland.

## II. LEGAL ANALYSIS

11 C.F.R. § 109.1(a) defines an independent expenditure as:

[a]n expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate. (emphasis added)

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In its response to the reason to believe finding, the Committee essentially reiterates verbatim its response to the complaint. The Committee argues that Morris Amitay ("Amitay") and Michael Goland ("Goland") were not agents or authorized fundraisers of the Committee. The '84 Committee contends that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay, yet, the Committee states that, "Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee...". Moreover, the Committee argues that Amitay, "did not hold any position within the campaign organization" and that Goland did not hold a position within the campaign nor was he authorized to make expenditures on its behalf. The Committee attaches an affidavit by a Reed Wilson in support of its position. Mr. Wilson was the campaign manager of the Committee. Essentially, Mr. Wilson's affidavit reiterates the Committee's response. Mr. Wilson swears that neither Goland nor Amitay had a position with the organization, that neither individual was authorized to raise

money on behalf of the Committee and that neither the Committee nor agents or employees of the Committee cooperated or consulted with Goland. The response to the interrogatories by Congressman Corcoran further supports the Committee's position that no evidence exists to support the '84 Committee's allegations that expenditures made by Mr. Goland were made with the cooperation, prior consent, at the request of or in consultation with Congressman Corcoran or his campaign.

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Morris Amitay's response to the Commission's interrogatories reflect essentially the position taken by Mr. Amitay in his response to the complaint notification. Mr. Amitay indicates that he did not control Goland's expenditures, that he was not an agent of the Corcoran campaign and that Goland made his expenditures independent of any direction from him. Further, Amitay states that he is an attorney, and, in that capacity, has provided a varied range of services to Goland including advice regarding the legal ramifications concerning the making of independent expenditures.

Mr. Goland's response to the interrogatories continues to assert the independence of his expenditure campaign against Charles Percy. Mr. Goland avers that his independent expenditure campaign was conducted out of self-interest and was not encouraged by Tom Corcoran, anyone related to the Corcoran campaign or Morris Amitay.

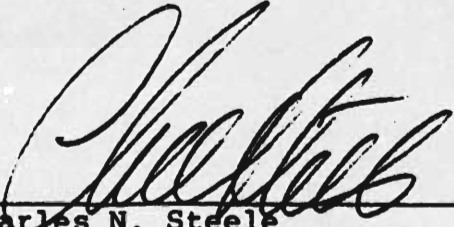
No evidence was found to exist to support the '84 Committee's allegation that the Goland expenditures were made

with the cooperation and prior consent of the Corcoran campaign. In addition, no evidence was developed to support the allegation that Mr. Amitay was aware of the Corcoran campaign's plans, projects and needs and communicated those needs to Mr. Goland, thereby nullifying the independence of Goland's expenditures.

**GENERAL COUNSEL'S RECOMMENDATION**

Based on the foregoing, it appears that there is no probable cause to believe Michael Goland made an excessive contribution to the Corcoran campaign in violation of 2 U.S.C. § 441a(a)(1)(A). Concurrently, it appears that there is no probable cause to believe the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

29 November 1984  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

85040511297



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 30, 1984

William Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 2667  
Aurora, Illinois 60507

Re: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Mr. Keck:

Based on a complaint filed with the Commission on April 26, 1984, and information supplied by you the Commission determined on October 2, 1984, that there was reason to believe that Corcoran for Senate Committee and you, as treasurer, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

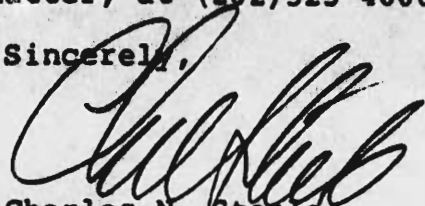
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying 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 submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

85040511293

Letter to William Keck  
Page 2

Should you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

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

Charles N. Steele  
General Counsel

Enclosure  
Brief

85040511299



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 30, 1984

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Morris Amitay  
Michael Goland

Dear Mr. Ifshin:

Based on a complaint filed with the Commission on April 26, 1984, and information supplied by your clients the Commission determined on October 2, 1984, that there was reason to believe that your client, Michael Goland, had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

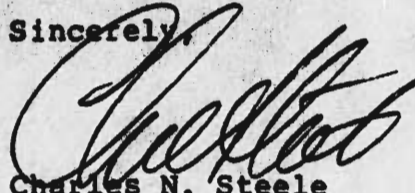
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues 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 submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

85040511300

Letter to David M. Ifshin  
Page 2

Should you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", written in a cursive style.

Charles N. Steele  
General Counsel

Enclosure  
Brief

85040511301

GCC#-SS08

**MANATT, PHELPS, ROTHENBERG & TUNNEY**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
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811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-8800

CRANLEY & CREST

November 5, 1984

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RECEIVED  
NOV 5 1984  
FEDERAL ELECTION COMMISSION

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

Dear Mr. Gross:

Please find enclosed the responses of Michael Goland and Morris Amitay to the Interrogatories submitted by the Commission. Unfortunately, Mr. Goland's father passed away this past Saturday and he has been unable to execute a signed copy in time for filing today. He has informed me by telephone this morning that he has received and approved the answers as submitted herewith and will execute the original. The responses will be returned to me by courier today and filed with the Commission upon receipt by my office. Mr. Amitay's executed responses are enclosed.

As I discussed with you and Mr. Steele upon service of the Interrogatories, there are a number of inquiries calling for responses irrelevant to this matter and that are unduly intrusive into the personal and private affairs of Mr. Amitay and Mr. Goland. For example, inquiries into the identity of a respondent or witness' friends and who they see socially are clearly beyond the scope of authority granted

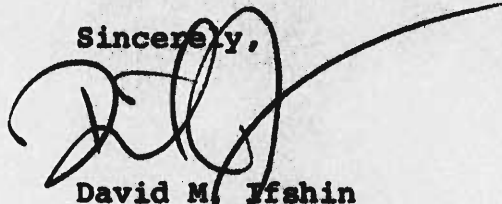
35040511302

MANATT, PHELPS, ROTHENBERG & TUNNEY

Kenneth Gross  
Page 2  
November 5, 1984

the Commission by Congress, or, indeed, could be granted to any Federal regulatory agency. Nonetheless, in order to permit a prompt resolution of this matter, we have attempted to answer these inquiries within the bounds of reason.

Sincerely,

A handwritten signature in dark ink, appearing to be 'David M. Pfshin', written over the word 'Sincerely,'.

David M. Pfshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak  
Enclosures

85040511303

BEFORE THE FEDERAL ELECTION COMMISSION

MORRIS AMITAY

MUR 1684

RESPONSE TO INTERROGATORIES

- (1) Have you ever been a member of Washington PAC?

ANSWER: Yes.

- (a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

ANSWER: Founder and treasurer since November 1980.

- (b) Describe the circumstances of how you came to know of Washington PAC.

ANSWER: Not applicable.

- (c) State the purpose of Washington PAC.

ANSWER: To make contributions to congressional candidates who support credible U.S. foreign and defense policies.

- (2) Were you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: Yes.

- (a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

ANSWER: From newspaper accounts. I do not recall the dates.

- (b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

ANSWER: I did not make any personal contributions to the Corcoran campaign.

- (c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: I recommended to the Washington PAC Advisory Board that PAC contributions be made. I also probably made supportive statements in newsletter columns and conversations but never solicited contributions.

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- (d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

ANSWER: No.

- (3) Do you know Tom Corcoran?

ANSWER: Yes.

- (a) If so, please state how and when you met Mr. Corcoran.

ANSWER: To my best recollection, I met Mr. Corcoran in late 1982 after hearing that he had expressed an interest in running for the Senate. I do not recall exactly when since I attend numerous fundraising events in Washington, visit frequently on Capitol Hill where my office is located. During these activities, I meet many Congressmen informally and by chance. I did have a formal meeting with him for my interview in the Spring 1983 for my news column and I did see him at events I attended around that time. None of the events were either sponsored by him or held for his benefit.

- (b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

ANSWER: To my best recollection, the encounters described above occurred prior to Mr. Corcoran's candidacy. I had no "relationship" with him during his candidacy other than as described in response to numbers (3)(d) and (5).

- (1) Were the two of you personal friends at the time?

ANSWER: We object to questions (3)(b)(1) and (2) to the extent that these questions seek information beyond the scope of the Commission's investigation and seek irrelevant personal information.

- (2) Did you see him socially?

- (a) If so, how often on the average?

- (c) Describe your relationship with the [sic] Mr. Corcoran at present.

ANSWER: I have not met with him for at least a year except for a chance encounter in a congressional building a few months ago.

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(1) Do you see him socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(d) When and where was the last occasion you spoke with Mr. Corcoran?

ANSWER: We exchanged greetings in the U.S. Capitol corridor about two months ago.

(1) On that occasion, what was the substance of your conversation?

ANSWER: Nothing relevant to the subject matter of this MUR.

(2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?

ANSWER: No.

(a) If so, what was the substance of your conversation(s)?

(4) Did you ever have business dealings with Mr. Corcoran?

ANSWER: No.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for this purpose during such dealings?

(5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?

ANSWER: Yes, but to the best of my recollection not after he declared his candidacy. These conversations were related to his appearance before the PAC and to notify him of forthcoming PAC contributions.

(a) If so, how often on the average?

ANSWER: Approximately three times.

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(6) Do you know Michael Goland?

ANSWER: Yes.

(a) If so, state how and when you met Mr. Goland.

ANSWER: To the best of my recollection it was in 1981 at a charitable event.

(b) Describe your relationship with Mr. Goland.

ANSWER: Our first meetings were in the context of events such as the one described above. I was later retained by Mr. Goland to perform legal services, assist on real estate investments and to provide information on issues of interest to him.

(1) Do you see each other socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Goland?

ANSWER: We spoke by phone last week.

(a) On that occasion, what was the substance of your discussion?

ANSWER: General political discussion on issues such as California Prop. 39. Nothing relevant to the subject matter of this MUR.

(b) Have you discussed this investigation with Mr. Goland?

ANSWER: Yes.

(1) If so, what was the substance of your conversation(s).

ANSWER: I advised him to retain special counsel when the complaint was first filed and to gather all relevant information.

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(7) Did you ever have business dealings with Mr. Goland?

ANSWER: Yes.

(a) If so, describe in detail the nature of your business dealings and state when they occurred?

ANSWER: See response to 6(b).

(b) How often did you see him for this purpose during such dealings?

ANSWER: I met with him periodically when visiting other clients or speaking at gatherings on the West Coast and in D.C. I cannot recall the precise number of times.

(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

ANSWER: Yes.

(a) If so, how often on the average?

ANSWER: Possibly about twice a month.

(b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

ANSWER: No, however, we did speak about Sen. Percy's record on foreign policy issues. We may also have discussed results of various polls relating to Percy's election.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

ANSWER: Yes.

(a) If so, when did the presentation(s) and viewing(s) occur?

ANSWER: April 6, 1983.

(b) What was the substance of the presentations? Was campaign strategy discussed?

ANSWER: The views of the candidate on foreign policy and defense issues. No specific campaign strategy was discussed other than references which were made by the candidate that he could beat Percy and that he needed funds to do so.

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- (1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?

ANSWER: I probably spoke to him after his presentation to thank him for coming.

- (a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.

ANSWER: It was probably a very brief thank you because another speaker spoke that day as well.

- (b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.

ANSWER: As Treasurer, I am in charge of making all arrangements for the regular luncheon meetings.

- (a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

ANSWER: Yes. A confirmation letter is routinely sent.

- (10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

ANSWER: No, other than his statement at the PAC luncheon in which he stated that he believed he could win the race.

- (1) If so, when?

- (2) Describe the substance of each such discussion and communication.

- (11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

ANSWER: No. Mr. Corcoran never requested my assistance. He did request financial assistance from Washington PAC.

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- (a) If so, describe what kind of assistance you provided as a result of the request.

ANSWER: I transmitted five PAC contributions between January 20, 1983 and January 25, 1984, to the Corcoran campaign. This is the usual contribution pattern for sending Washington PAC contributions tied to specific fundraising events. To the best of my recollection, I also sent Mr. Corcoran by mail, a brief summary of Senator Percy's public positions on the Middle East. The summary was prepared and published by an organization unrelated to Washington PAC and is publicly available on request.

- (12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

ANSWER: No, other than the PAC financial assistance as outlined above.

- (a) If so, what suggestions or strategies did you discuss with him?

- (b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

ANSWER: No.

- (13) Have you and Mr. Goland ever discussed the Percy campaign?

ANSWER: Yes.

- (a) If so, when and where did these discussions take place?

ANSWER: We sporadically discussed that campaign as well as others in the course of our legal and business dealings.

- (b) Describe the content and substance of the discussions.

ANSWER: I informed Mr. Goland of the progress of a number of races as discussed in the PAC newsletter, copies of which were attached to my response.

- (14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

ANSWER: Yes.

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- (a) If so, what was the substance of the advice requested by Mr. Goland?

ANSWER: The advice requested was limited to guidance under the FECA and thus is subject to the attorney client privilege.

- (b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

ANSWER: The advice is subject to the attorney client privilege.

- (15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

ANSWER: No.

- (a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?
- (b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.
- (c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?
- (d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?
- (e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

- (16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

ANSWER: This question assumes incorrectly that I was giving Mr. Goland advice on the campaign. On the contrary, as stated above, I was providing legal advice to Mr. Goland. Therefore, I never had any such conversations with Mr. Corcoran. On one occasion, after I became aware of Mr. Goland's independent expenditures, I received a phone call from a woman whose name I do not recall who identified herself as from Mr. Corcoran's office. I informed her at that time that I would not talk to her--before she indicated the purpose of the call--because a client of mine was making independent expenditures in the Senate race.

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- (a) If so, what was the substance of the discussion or communication regarding this advice?
- (b) When did such discussions or communications with Mr. Corcoran occur?

(17) Did you ever interview Mr. Corcoran?

ANSWER: Yes, on one occasion.

(a) For each such interview state:

- (1) The date and location of the interview.

ANSWER: I do not recall the exact date. I believe it was in March or April 1983. It took place in his office.

- (2) Who was present at the interview?

ANSWER: Mr. Corcoran and some aides whose names I do not recall.

- (3) The purpose of the interview?

ANSWER: As stated in my response to the complaint, the purpose of the interview was to obtain information about Mr. Corcoran's positions for the PAC newsletter and my column.

- (4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.

ANSWER: I requested the interview for the above reasons. There was no "interview script." I asked him questions relevant to the issues addressed in the column and newsletter. Mr. Corcoran had no input.

- (5) The content and substance of each interview.

ANSWER: The interview was on his views on foreign policy.

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- (1) Was the subject of the Corcoran campaign discussed?

ANSWER: The Corcoran campaign was not discussed except that Corcoran stated that he believed he could win because of Republican disaffection with Senator Percy.

- (a) If so, describe what about the Corcoran campaign was discussed during the interview.

ANSWER: See above.

- (18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

ANSWER: Yes, a friend of mine in Illinois sent me a copy he had received.

- (a) If so, for each such brochure ANSWER the following:

- (1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?

ANSWER: I don't recall the date. I believe it may have been July or August 1983.

- (2) Did you voluntarily appear in the picture on the fundraising brochure?

ANSWER: While I was interviewing Mr. Corcoran, he asked if I minded having my picture taken. I have frequently had my picture taken with Members of Congress, so I consented. I had no idea at the time that it was for the purpose of using in a campaign brochure.

- (3) By what procedure were you selected to appear on the fundraising brochure?

ANSWER: I have no idea.

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- (4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?

ANSWER: After the interview was published, I was asked if I minded if a portion of it appeared in a brochure. I do not recall the name of the person who asked.

- (5) When and where was the picture used in the brochure taken?

ANSWER: At the time of the interview.

- (6) For what purpose did your picture appear on the brochure?

ANSWER: It was not disclosed to me at the time.

- (7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?

ANSWER: I have no idea.

- (8) Did you assist or have any input into the development of the brochure?

ANSWER: No.

- (19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: No.

(a) If so, when and in what capacity were you working?

(b) How long did you work in each such capacity?

- (20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: I did not conduct or arrange any fundraisers for Mr. Corcoran. I do not recall precisely, but I may have attended one event following the making of a PAC contribution.


85040511314

Morris Amitay  
MUR 1684  
Response to Interrogatories  
Page 12

- (a) For each such fundraiser, state when and where it occurred.

ANSWER: I do not recall the date or place except that, to the best of my recollection, it may have been in the spring of 1983 and that it was held in Washington, D.C.

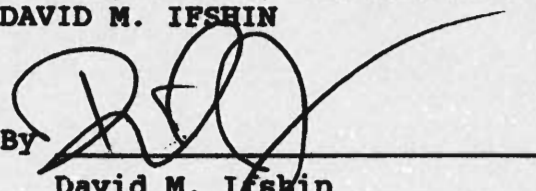
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

  
Morris Amitay 11-5-84

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By

  
David M. IFSHIN  
Attorney for Morris Amitay

Date: November 5, 1984

85040511315

BEFORE THE FEDERAL ELECTION COMMISSION

MICHAEL GOLAND

MUR 1684

RESPONSE TO INTERROGATORIES

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

ANSWER: 505 North Lakeshore Drive  
Apartment #4009  
Chicago, Illinois 60611

Self-Employed Businessman  
20221 Prairie Street  
Chatsworth, California 90311

12 years

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

ANSWER: Sometime late in 1983.

a) State whether the funds used to make the expenditures were personal funds.

ANSWER: Yes.

b) State whether you received contributions from others in support of your effort.

ANSWER: I did not.

(1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

ANSWER: I was neither so counselled, encouraged and/or advised.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

ANSWER: Self-interest.

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- (a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: I do not recall exactly when I became aware of Mr. Corcoran's decision to run. At no time did that decision have any bearing on my decision to make expenditures against Mr. Percy.

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

ANSWER: To the best of my recollection, I read it in the newspaper. I do not recall the date.

(6) Did you contribute any funds in support of the Corcoran campaign?

ANSWER: No.

- (a) If so, when and in what amount(s)?  
(b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: No.

- (c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

ANSWER: No.

(7) Do you know Tom Corcoran?

ANSWER: I have never met or spoken to Tom Corcoran or anyone on his congressional or campaign staff.

- (a) If so, please state when and how you met Mr. Corcoran.  
(b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

ANSWER: I had never heard of him.

- (1) Did you see him socially?  
(a) If so, how often on the average?

ANSWER: We object to question (7)(b)(1)(a) to the extent that this question seeks information beyond the scope of the Commission's investigation and

35040511317

seeks irrelevant personal information.

(c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.

(1) Have you seen him socially?

(a) If so, how often on the average?

ANSWER: We object to question (7)(c)(1) to the extent that this question seeks information beyond the scope of the Commission's investigation and seeks irrelevant personal information.

(d) When and where was the last occasion you spoke with Mr. Corcoran?

(1) State the substance of your conversation.

(2) State whether you have discussed this investigation with Mr. Corcoran.

(a) If so, state the substance of each such conversation, when it occurred and who else was present.

ANSWER: I have never met or spoken with Mr. Corcoran or to anyone on his campaign or congressional staffs.

(8) State whether you have ever had business dealings with Mr. Corcoran.

ANSWER: I have not.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

ANSWER: No.

(a) If so, how often - on the average?

(b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

(a) If so, list the dates of your membership.

(1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.

(2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

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- (b) Describe the circumstances of how you came to know of Washington PAC?

ANSWER: When the Washington Political Action Committee was first formed, I contributed to it at the suggestion of Morris Amitay. Mr. Amitay informed me of the formation of the PAC and requested my participation and financial support. I also agreed to let my name be used as part of the advisory board. I have never attended a meeting of the Washington PAC nor have I ever been a part of any policy discussions, meetings or other processes. I have never participated in any of the decisions or expenditures made by the Washington PAC; my advice has neither been requested nor given. My relationship with the Washington PAC ended in June, 1983.

- (11) Did you ever speak with Tom Corcoran at the PAC's offices?  
For each conversation state:

ANSWER: No.

- (a) When you spoke with Mr. Corcoran.
- (b) Whether it was face-to-face or by telephone.
- (c) The nature of the discussion.
- (d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- (e) Whether you had begun to make expenditures against Senator Percy's campaign.
- (f) Whether you had made any contributions to the Corcoran campaign.

- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

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(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

ANSWER: No.

(a) If so, describe what assistance you provided his campaign.

(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

ANSWER: No.

(a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

ANSWER: No.

(a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

ANSWER: To the best of my recollection, I first met Mr. Amitay at a cocktail party in March, 1981, in Washington. While it is possible that I may have met him on a prior occasion, I have no specific recollection.

(a) Describe your relationship with Mr. Amitay.

ANSWER: Mr. Amitay is one of my attorneys. My only relationship with Mr. Amitay in regard to my activities in the 1984 Illinois Senatorial Campaign was that he advised me on compliance with the Federal Election Campaign Act and reporting procedures for independent expenditures.

(1) Do you see each other socially?

ANSWER: Same objection as to question (7) (b) (1) (a).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Amitay?

ANSWER: We speak periodically by telephone. I last spoke

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with Mr. Amitay last week.

- (a) On that occasion, what was the substance of your discussion?

ANSWER: It did not pertain to any matter relevant to the 1984 Illinois Senate race or any other matter relevant to this MUR.

- (3) Have you discussed this investigation with Mr. Amitay?

ANSWER: No, other than a brief conversation after the complaint was filed regarding the necessity for legal representation.

- (a) If so, when and what was the substance of your conversation(s)?

- (18) Did you ever have business dealings with Mr. Amitay?

ANSWER: None outside our retainer agreement.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred?  
(b) How often did you speak to him for business purposes during such dealings?

- (19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

- (a) If so, how often - on the average?  
(b) When was the last time you spoke with Mr. Amitay by telephone?

- (1) What was the subject and purpose of your discussion?

ANSWER: My only discussions with Mr. Amitay by telephone or other means regarding my independent expenditures in the 1984 Senatorial campaign were in the course of legal advice given me by Mr. Amitay on compliance with the Federal Election Campaign Act in regard to my independent expenditures.

- (20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

ANSWER: No.

- (a) If so, when did the presentation(s) occur?  
(1) Did you ever speak with Tom Corcoran following his presentation?

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- (a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran?

ANSWER: No.

If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

ANSWER: No.

- (a) If so, list the date(s) of the interview(s).  
(b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?  
(c) What input did you have in the coordinating or arranging of the interview(s)?  
(d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

ANSWER: No.

If so, for each such discussion state:

- (a) When and where the discussion took place.  
(b) The substance of the discussion.  
(c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- (a) If so, when and where did these discussions take place?  
(b) Describe the content and substance of each such discussion.

ANSWER: Mr. Amitay provided me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures. He also provided me with some information on Percy's voting record.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

ANSWER: As noted previously, the only significant involvement of Mr. Amitay in this matter was to provide me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures.

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(a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

ANSWER: No.

(a) If so, for each occasion on which such advice was given state:

- (1) the date the advice was given.
- (2) the substance of the advice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

\_\_\_\_\_  
Michael Goland

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By \_\_\_\_\_  
David M. Ifshin  
Attorney for Michael Goland

Date: \_\_\_\_\_

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FROM . .

MANATT, PHELPS, ROTHENBERG & TUNNEY

*Attorneys at Law*

Suite 200

1200 New Hampshire Avenue, N.W.

WASHINGTON, D.C. 20006

TO . .

Kenneth A. Gross

Assistant Legal Counsel

Federal Election Commission

1325 K Street, N.W.

7th Floor

Washington, D.C.

20463

MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

RECEIVED AT THE FEC

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WESTSIDE OFFICE

1326 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CALIFORNIA 90064  
(213) 282-4000

SAN FRANCISCO OFFICE

FOUR EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 981-7540

LOS ANGELES (DOWNTOWN)

811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 486-8500

November 20, 1984

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

Dear Mr. Gross:

RE: MUR 1684  
Michael Goland

As stated in our letter of November 5, 1984, enclosed please find an executed original of Michael Goland's Responses to Interrogatories in the above noted MUR.

If anything else is needed, please do not hesitate to call.

Sincerely,

*David M. Ifshin*  
David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak  
Enclosure

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RECEIVED  
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

MICHAEL GOLAND

MUR 1684

RESPONSE TO INTERROGATORIES

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

ANSWER: 505 North Lakeshore Drive  
Apartment #4009  
Chicago, Illinois 60611

Self-Employed Businessman  
20221 Prairie Street  
Chatsworth, California 90311

12 years

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

ANSWER: Sometime late in 1983.

a) State whether the funds used to make the expenditures were personal funds.

ANSWER: Yes.

b) State whether you received contributions from others in support of your effort.

ANSWER: I did not.

(1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

ANSWER: I was neither so counselled, encouraged and/or advised.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

ANSWER: Self-interest.

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- (a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: I do not recall exactly when I became aware of Mr. Corcoran's decision to run. At no time did that decision have any bearing on my decision to make expenditures against Mr. Percy.

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

ANSWER: To the best of my recollection, I read it in the newspaper. I do not recall the date.

(6) Did you contribute any funds in support of the Corcoran campaign?

ANSWER: No.

- (a) If so, when and in what amount(s)?  
(b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: No.

- (c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

ANSWER: No.

(7) Do you know Tom Corcoran?

ANSWER: I have never met or spoken to Tom Corcoran or anyone on his congressional or campaign staff.

- (a) If so, please state when and how you met Mr. Corcoran.  
(b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

ANSWER: I had never heard of him.

- (1) Did you see him socially?  
(a) If so, how often on the average?

ANSWER: We object to question (7)(b)(1)(a) to the extent that this question seeks information beyond the scope of the Commission's investigation and

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seeks irrelevant personal information.

- (c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.
- (1) Have you seen him socially?
- (a) If so, how often on the average?

ANSWER: We object to question (7) (c) (1) to the extent that this question seeks information beyond the scope of the Commission's investigation and seeks irrelevant personal information.

- (d) When and where was the last occasion you spoke with Mr. Corcoran?
- (1) State the substance of your conversation.
- (2) State whether you have discussed this investigation with Mr. Corcoran.
- (a) If so, state the substance of each such conversation, when it occurred and who else was present.

ANSWER: I have never met or spoken with Mr. Corcoran or to anyone on his campaign or congressional staffs.

- (8) State whether you have ever had business dealings with Mr. Corcoran.

ANSWER: I have not.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred.
- (b) How often did you see him for business purposes during such dealings?

- (9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

ANSWER: No.

- (a) If so, how often - on the average?
- (b) What was the subject and purpose of your discussions?

- (10) Were you ever a member of Washington PAC?

- (a) If so, list the dates of your membership.
- (1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.
- (2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

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- (b) Describe the circumstances of how you came to know of Washington PAC?

ANSWER: When the Washington Political Action Committee was first formed, I contributed to it at the suggestion of Morris Amitay. Mr. Amitay informed me of the formation of the PAC and requested my participation and financial support. I also agreed to let my name be used as part of the advisory board. I have never attended a meeting of the Washington PAC nor have I ever been a part of any policy discussions, meetings or other processes. I have never participated in any of the decisions or expenditures made by the Washington PAC; my advice has neither been requested nor given. My relationship with the Washington PAC ended in June, 1983.

- (11) Did you ever speak with Tom Corcoran at the PAC's offices?  
For each conversation state:

ANSWER: No.

- (a) When you spoke with Mr. Corcoran.
- (b) Whether it was face-to-face or by telephone.
- (c) The nature of the discussion.
- (d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- (e) Whether you had begun to make expenditures against Senator Percy's campaign.
- (f) Whether you had made any contributions to the Corcoran campaign.

- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

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(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

ANSWER: No.

(a) If so, describe what assistance you provided his campaign.

(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

ANSWER: No.

(a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

ANSWER: No.

(a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

ANSWER: To the best of my recollection, I first met Mr. Amitay at a cocktail party in March, 1981, in Washington. While it is possible that I may have met him on a prior occasion, I have no specific recollection.

(a) Describe your relationship with Mr. Amitay.

ANSWER: Mr. Amitay is one of my attorneys. My only relationship with Mr. Amitay in regard to my activities in the 1984 Illinois Senatorial Campaign was that he advised me on compliance with the Federal Election Campaign Act and reporting procedures for independent expenditures.

(1) Do you see each other socially?

ANSWER: Same objection as to question (7) (b) (1) (a).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Amitay?

ANSWER: We speak periodically by telephone. I last spoke

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with Mr. Amitay last week.

- (a) On that occasion, what was the substance of your discussion?

ANSWER: It did not pertain to any matter relevant to the 1984 Illinois Senate race or any other matter relevant to this MUR.

- (3) Have you discussed this investigation with Mr. Amitay?

ANSWER: No, other than a brief conversation after the complaint was filed regarding the necessity for legal representation.

- (a) If so, when and what was the substance of your conversation(s)?

- (18) Did you ever have business dealings with Mr. Amitay?

ANSWER: None outside our retainer agreement.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred?  
(b) How often did you speak to him for business purposes during such dealings?

- (19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

- (a) If so, how often - on the average?  
(b) When was the last time you spoke with Mr. Amitay by telephone?

- (1) What was the subject and purpose of your discussion?

ANSWER: My only discussions with Mr. Amitay by telephone or other means regarding my independent expenditures in the 1984 Senatorial campaign were in the course of legal advice given me by Mr. Amitay on compliance with the Federal Election Campaign Act in regard to my independent expenditures.

- (20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

ANSWER: No.

- (a) If so, when did the presentation(s) occur?  
(1) Did you ever speak with Tom Corcoran following his presentation?

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- (a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran?

ANSWER: No.

If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

ANSWER: No.

- (a) If so, list the date(s) of the interview(s).  
(b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?  
(c) What input did you have in the coordinating or arranging of the interview(s)?  
(d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

ANSWER: No.

If so, for each such discussion state:

- (a) When and where the discussion took place.  
(b) The substance of the discussion.  
(c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- (a) If so, when and where did these discussions take place?  
(b) Describe the content and substance of each such discussion.

ANSWER: Mr. Amitay provided me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures. He also provided me with some information on Percy's voting record.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

ANSWER: As noted previously, the only significant involvement of Mr. Amitay in this matter was to provide me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures.

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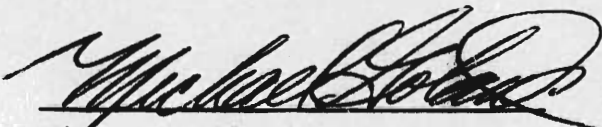
(a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

ANSWER: No.

- (a) If so, for each occasion on which such advice was given state:
- (1) the date the advice was given.
  - (2) the substance of the advice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

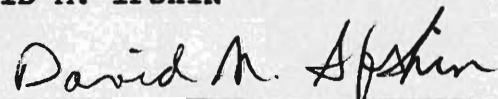
  
Michael Goland

11/16/84

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By

 (SPJ)

David M. Ifshin  
Attorney for Michael Goland

Date:

11/20/84

By: Timothy P. Furlong  
Partner  
Manatt, Phelps, Rothenberg & Tunney

95040511333



CORCORAN FOR SENATE COMMITTEE  
P. O. BOX 2667 • AURORA, ILLINOIS 60507

RECEIVED  
OFFICE OF THE FEC  
SECRETARY

84 NOV 1 P3:22  
October 25, 1984

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
84 NOV 1 P5:45

Ms. Lee Ann Elliott  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1684

Dear Madame Chairman:

I am writing in response to your letter dated October 5, 1984 to me involving the complaint filed by Senator Charles H. Percy ("Percy") and Citizens for Percy '84 ("Citizens") against, inter alia, the Corcoran for Senate Committee ("Committee"). In your October 5, 1984 letter, you acknowledged receipt of my response to the complaint dated May 18, 1984.

In that May 18, 1984 response, a copy of which is enclosed, you will find a detailed rebuttal to all of the assertions made by Percy and Citizens against the Committee. I am not going to repeat those arguments, based on your own FEC regulations and definitions which were cited by me previously as indicated. However, the conclusions, based on sworn testimony, are inescapable:

- I. Morris Amitay and Michael Goland were not agents or authorized fundraisers of the Committee.
- II. The Committee was not aware that Goland used the same direct mail consultant.

Therefore, the Committee respectfully asks the FEC to find that no further action should be taken against the Committee on the basis of the complaint. The Committee's sworn testimony refutes the allegations based on information and belief of Percy and Citizens.

Respectfully submitted,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

Enclosure

85040511334



CORCORAN FOR SENATE COMMITTEE

P. O. BOX 2667 • AURORA, ILLINOIS 60507

Steele, Charles

May 18, 1984

MAY 21 10:25

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

Re: MUR 1684

Dear Mr. Steele:

This letter is written in response to your letter dated April 30, 1984 and the complaint filed by Senator Charles H. Percy ("Percy") and Citizens for Percy '84 ("Citizens") against, inter alia, the Corcoran for Senate Committee ("Committee"). 2 U.S.C. §437g(a). Percy and Citizens contend that the Committee violated the Federal Election Campaign Act of 1971, as amended, by cooperating and consulting with Michael Goland ("Goland") who made independent expenditures on behalf of the Committee. Percy and Citizens allege that Goland made the expenditures at the direction of Morris Amitay ("Amitay") who allegedly "was both an agent of and fundraiser for the Corcoran campaign" and "was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs." See Complaint at 2. Percy and Citizens acknowledge that their complaint is based upon their information and belief that such allegations are true and not upon documentary evidence or sworn statements. See Complaint at 1. Percy and Citizens also contend that the use of the same direct mail fundraising firm by Goland and the Committee mandates that Goland's expenditures are presumptively not independent.

- I. Morris Amitay and Michael Goland were not agents or authorized fundraisers of the Committee.

In its regulations at 11 C.F.R. §109.1(a), the Federal Election Commission ("FEC") defines independent expenditure as:

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an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.

Percy and Citizens contend that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay. The FEC defines agent at 11 C.F.R. §109.1(b)(5) as:

any person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures.

Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or the candidate, Thomas Corcoran. See Affidavit of Reed J. Wilson ("Wilson Affidavit") at 4. Amitay did not hold any position within the campaign organization. See Wilson Affidavit at 5. Likewise, Goland was not authorized to make expenditures on behalf of the campaign nor did he hold any position within the campaign organization. See Wilson Affidavit at 4-5.

Percy and Citizens further contend that Goland's independent expenditures were "made with the cooperation or with prior consent of, or in consultation with, or at the request of, a candidate or any agent or authorized committee of the candidate" because such expenditures were made through Amitay who was authorized to raise funds for the Committee. See 11 C.F.R. §§ 109.1(a)(4) and 109.1(a)(4)(i)(B). An expenditure is presumed to be made at the direction of the candidate if it is made through an authorized fundraiser. See 11 C.F.R. § 109.1(a)(4)(i)(B). Amitay was never authorized by the Committee to raise funds on its behalf. See Wilson Affidavit at 6. Likewise, Goland was not authorized to raise funds for the Committee. See Wilson Affidavit at 6.

85040511336

Mr. Steele  
May 18, 1984  
Page Three

The Committee did not cooperate or consult with Goland nor did it participate in the making of Goland's independent expenditures. See Wilson Affidavit at 7. Also, neither Goland nor Amitay were agents or authorized fundraisers of the Committee. See Wilson Affidavit at 7. The Committee had no involvement in Goland's expenditures and asks the FEC to take no further action against it.

II. The Committee was not aware that Goland used the same direct mail consultant.

Percy and Citizens contend that the use of the same direct mail consultant, AB Data, Ltd. ("AB Data"), by Goland and the Committee gives rise to a presumption that Goland's expenditures were not independent. The Committee was not aware that Goland used the same direct mail consultant. See Wilson Affidavit at 9. As a result of the above-mentioned relationship of the Committee with AB Data and its lack of knowledge that Goland used the same firm, the FEC could not sustain a finding of coordination between Goland and the Committee through AB Data, see MUR 1252/1299, General Counsel's Brief at 39, and, therefore, the Committee asks the FEC to take no further action against it.

III. Conclusion

The Committee respectfully asks the FEC to find that no further action should be taken against the Committee on the basis of the complaint. The Committee's sworn testimony refutes the allegations based on information and belief of Percy and Citizens.

Respectfully submitted,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

35040511337

BEFORE THE FEDERAL ELECTION  
COMMISSION OF THE UNITED STATES  
OF AMERICA

IN THE MATTER  
OF CORCORAN FOR  
SENATE COMMITTEE et al.

MUR 1684

AFFIDAVIT

COUNTY OF LASALLE  
STATE OF ILLINOIS

)  
) ss:  
)

Reed J. Wilson for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein, and am competent to testify thereto.

2. I was the campaign manager for Thomas J.

Corcoran and his principal campaign committee, the Corcoran for Senate Committee ("Committee"), in Mr. Corcoran's campaign for the Republican nomination for the office of United States Senator from the State of Illinois.

3. I directed and supervised all aspects of the campaign and was aware of Mr. Corcoran's and the Committee's relationship with campaign employees, agents, fundraisers and consultants.

4. Neither Morris Amitay ("Amitay") nor Michael Goland ("Goland") had oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or Mr. Corcoran.

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5. Neither Amitay nor Goland held any position with the Corcoran campaign organization.

6. Neither Amitay nor Goland were authorized to raise funds for the Committee.

7. Neither Mr. Corcoran, the Committee nor any employees or agents of the Committee cooperated or consulted with Goland in the making of expenditures on behalf of the Committee.

8. AB Data, Ltd. ("AB Data") was retained by the Committee in January, 1983 to perform direct and voter contact mail services. These services included the obtaining of direct mail lists, the creation of fundraising copy and packages, the maintenance of contributor files, the production and mailing of fundraising packages, and the creation and production of voter contact mail to Republican households in selected counties within the state. The Committee did not ask AB Data to provide any services or consultation to the campaign beyond those listed above.

9. The Committee did not know until after the completion and mailing of the Goland direct mail program that Goland also used AB Data as a direct mail consultant.

Reed J. Wilson  
Reed J. Wilson

Subscribed and sworn to before me this 18th day of May, 1984.

Sharon D. Courser

95040511339

**Corcoran**

**CORCORAN FOR SENATE COMMITTEE**

P. O. BOX 2667 • AURORA, ILLINOIS 60507

OGC # 5448

24 OCT 30 P 5: 15

October 29, 1984

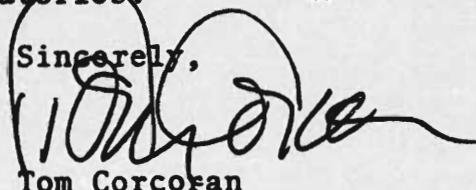
Ms. Lee Ann Elliott,  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Madame Chairman:

This letter responds to your letter dated October 5, 1984 in furtherance of the investigation of the above-captioned matter. I am enclosing my answers to the questions contained in the Interrogatories.

Sincerely,

  
Tom Corcoran  
Representative in Congress

Enclosure

35040511340

BEFORE THE FEDERAL ELECTION COMMISSION  
OF THE UNITED STATES OF AMERICA

IN THE MATTER OF  
CORCORAN FOR SENATE  
COMMITTEE, et al.

)  
)  
)

MATTER UNDER REVIEW 1684

RESPONSE OF THE HONORABLE THOMAS CORCORAN  
TO THE INTERROGATORIES POSED TO HIM BY  
THE FEDERAL ELECTION COMMISSION

1. 3:00 p.m., December 13, 1982.
2. During the week of December 5, 1982, I received a telephone call from Paul Weyrich, who said that he had seen Morris Amitay in an airport that day. Amitay had asked him if he knew whether or not the rumors about Congressman Tom Corcoran challenging Senator Percy in the 1984 GOP Primary were true. Weyrich answered that he had had a couple of conversations with Corcoran, and he thought he was pretty serious about challenging Percy. Amitay then asked if Weyrich would find out if Corcoran were willing to meet with him. I agreed to the meeting with Amitay.

Based on that telephone call with Weyrich, a meeting was arranged involving me and Morris Amitay, on December 13, 1982. That was the first meeting with Morris Amitay. We had never met before that time.

3. After the primary election campaign had ended, I saw Morris Amitay in the Rayburn House Office Building outside the Energy and Commerce Committee hearing room (Room 2123) as I was walking to a public meeting of that Committee, of which I am a member. We shook hands, and I asked what brought him to the Committee hearing. He said a bill in which he had an interest for a client. Regarding the Percy FEC complaint, I said that it was my observation that in matters like this, it is usually the loser who complains about the winner, not vice versa. We laughed and parted. Nothing else was said.
4. No.

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5. Yes

- a) Five or six times total.
- b) I cannot recall the date of my last conversation with Mr. Amitay.
  - 1. I do not recall the subject and purpose of my last conversation with Mr. Amitay.

6. In my meeting with Morris Amitay on December 13, 1982, he advised me that he had organized a political action committee, although I do not recall that he identified it by name.

- a) I understand that the purpose of the Washington PAC was to raise and expend monies on behalf of candidates who support better United States-Israel relations.
- b) I have never been a member of Washington PAC.
- c) Yes.
  - 1. Morris Amitay. My meeting with Amitay on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983. See answer, question 9.

d) No.

7. Yes.

- a) During my meeting with him on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983.
- b) Not Applicable.

8.

- a) No.
- b) No.
  - 1. Not applicable.
  - 2. No.
  - 3. No.
- c) No.
- d) No.

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e) No.

f) No.

g) Yes.

1. A total of five or six telephone conversations.
2. To set up meetings with key Jewish political leaders for their support and fundraising assistance.

h) No.

9. Yes.

a) April 7, 1983.

b) The purpose of my appearance was to discuss my reasons for challenging Senator Percy in the GOP primary election.

c) Arrangements for this meeting were made by Morris Amitay and Martha Kaufman.

1. I was contacted by telephone by Martha Kaufman. There was subsequent confirmation of the time and place by Ken Toltz of Washington PAC.
2. Morris Amitay was present; Michael Goland was not present.
3. My reasons for challenging Senator Percy.
4. No.

10. Yes.

a) April 14, 1983 in my office at 2447 Rayburn House Office Building.

1. Morris Amitay and myself.
2. To discuss United States-Israel relations and my differences with Senator Percy on issues affecting United States-Israel relations. Mr. Amitay interviewed me for the purpose of publishing my remarks in a newsletter which he edited.

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3. The substance of the interview was the historical perspective that ties the United States and Israel together, current United States-Israel problems, and the differences between Senator Percy and me on these points.

4. No.

12. Yes.

a)

1. I do not know. Jerry Benjamin of AB Data, who ran my direct mail fundraising program, made this decision.
2. I do not know. See my answer to question 12(a) (1).
3. April 14, 1983 in my office at 2447 Rayburn House Office Building.
4. I do not know. See my answer to question 12(a) (1).
5. I do not know. See my answer to question 12(a) (1).
6. I do not know. See my answer to question 12(a) (1).

13. No.

a) Not Applicable.

b)

1. No.
2. No.
  - a. Not Applicable.
  - b. Not Applicable.
  - c. No.
  - d. No.

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14.

1. No.
2. No.
3. No.
4. No.
5. No.

15. Not Applicable.

16. Yes.

- a) I first learned about Mr. Goland's advertising program against Senator Percy while watching an evening television news program on Channel 9 in Chicago. The date was March 9, 1984. This story was amplified in later news accounts, and, of course, I was asked by many news reporters to give my reaction to Goland's "chameleon" commercial and his subsequent mailings. I told them that I thought it was outrageous, ineffective and in poor taste. I also believed then and now that this television commercial was counter-productive to my campaign.

17. No.

- a) Not Applicable.
- b) No.
- c) Not Applicable.

  
Thomas Corcoran

Subscribed and sworn to before me this 29<sup>th</sup> day of  
October, 1984.

  
Notary Public

Charles A. Mallon  
Notary Public, Dist. of Columbia  
Commission Expires, Sept. 30, 1989

85040511345



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1984

Steven A. Nissen, Esq.  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

RE: MUR 1684  
Morris Amitay

Dear Mr. Nissen:

On May 7, 1984, the Commission notified your client, Morris Amitay, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time.

Upon review of the allegations contained in the complaint and information supplied by your client, the Commission decided, on October 2, 1984, to take no action at this time with respect to any possible violation of the Act by your client.

The attached order which requires your client to provide certain information has been issued in connection with the ongoing investigation. The Commission no longer considers Mr. Amitay to be a respondent, but rather considers him a witness only. Your client is required to submit the information under oath within ten days of your receipt of this order.

If you have any questions, please direct them to Duane A. Brown, the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Attachments  
Order and questions

35040511346

BEFORE THE FEDERAL ELECTION COMMISSION

Morris Amitay

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

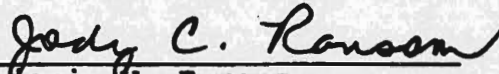
Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on *October 4*, 1984.

  
Lee Ann Elliott  
Chairman

ATTEST:

  
for Marjorie W. Emmons  
Secretary to the Commission

Attachment(s)

35040511347

FEDERAL ELECTION COMMISSION

To: Morris Amitay  
MUR 1684

INTERROGATORIES

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain primarily to your position with Washington PAC and your relationships with Michael Goland and Representative Tom Corcoran.

(1) Have you ever been a member of Washington PAC?

a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

b) Describe the circumstances of how you came to know of Washington PAC.

c) State the purpose of Washington PAC.

(2) Were you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

(3) Do you know Tom Corcoran?

a) If so, please state how and when you met Mr. Corcoran.

b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

1) Were the two of you personal friends at the time?

2) Did you see him socially?

a) If so, how often on the average?

c) Describe your relationship with the Mr. Corcoran at present.

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- 1) Do you see him socially?  
a) If so, how often on the average?
- d) When and where was the last occasion you spoke with Mr. Corcoran?  
1) On that occasion, what was the substance of your conversation?  
2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?  
a) If so, what was the substance of your conversation(s)?
- (4) Did you ever have business dealings with Mr. Corcoran?  
a) If so, describe in detail the nature of your business dealings and state when they occurred.  
b) How often did you see him for this purpose during such dealings?
- (5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?  
a) If so, how often on the average?
- (6) Do you know Michael Goland?  
a) If so, state how and when you met Mr. Goland.  
b) Describe your relationship with Mr. Goland.  
1) Do you see each other socially?  
a) If so, how often on the average?  
2) When and where was the last occasion you saw or spoke with Mr. Goland?  
a) On that occasion, what was the substance of your discussion?  
b) Have you discussed this investigation, with Mr. Goland?  
1) If so, what was the substance of your conversation(s).
- (7) Did you ever have business dealings with Mr. Goland?  
a) If so, describe in detail the nature of your business dealings and state when they occurred?  
b) How often did you see him for this purpose during such dealings?

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(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

- a) If so, how often on the average? .
- b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

- a) If so, when did the presentation(s) and viewing(s) occur?
- b) What was the substance of the presentations? Was campaign strategy discussed?

1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?

- a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.
- b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.
  - a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

(10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

- 1) If so, when?
- 2) Describe the substance of each such discussion and communication.

(11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

- a) If so, describe what kind of assistance you provided as a result of the request.

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(12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

a) If so, what suggestions or strategies did you discuss with him?

b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

(13) Have you and Mr. Goland ever discussed the Percy campaign?

a) If so, when and where did these discussions take place?

b) Describe the content and substance of the discussions.

(14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

a) If so, what was the substance of the advice requested by Mr. Goland?

b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

(15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?

b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.

c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?

d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?

e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

(16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

a) If so, what was the substance of the discussion or communication regarding this advice?

b) When did such discussions or communications with Mr. Corcoran occur?

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(17) Did you ever interview Mr. Corcoran?

a) For each such interview state:

- 1) The date and location of the interview.
- 2) Who was present at the interview?
- 3) The purpose of the interview?
- 4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.
- 5) The content and substance of each interview.
  - 1) Was the subject of the Corcoran campaign discussed?
    - a) If so, describe what about the Corcoran campaign was discussed during the interview.

(18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

- a) If so, for each such brochure answer the following:
- 1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?
  - 2) Did you voluntarily appear in the picture on the fundraising brochure?
  - 3) By what procedure were you selected to appear on the fundraising brochure?
  - 4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?
  - 5) When and where was the picture used in the brochure taken?
  - 6) For what purpose did your picture appear on the brochure?
  - 7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?
  - 8) Did you assist or have any input into the development of the brochure?

(19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

- a) If so, when and in what capacity were you working?
- b) How long did you work in each such capacity?

35040511352

Morris Amitay  
MUR 1684  
Interrogatories  
Page 6

(20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

a) For each such fundraiser, state when and where it occurred.

85040511353



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 5, 1984

William Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 2667  
Aurora, Illinois 60507

RE: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Mr. Keck:

The Federal Election Commission notified you on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time. We acknowledge receipt of your explanation of this matter which was dated May 18, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on October 2, 1984, determined that there is reason to believe the Corcoran for Senate Committee and you, as treasurer, have violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that the committee and you, as treasurer, accepted excessive contributions, in the form of coordinated expenditures, from Michael Goland. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such materials within ten days of your receipt of this notification. All statements should be under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you and 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.

35040511354

Letter to William Keck  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

*Lee Ann Elliott*  
Lee Ann Elliott  
Chairman

cc: Representative Corcoran

35040511355



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

October 5, 1984

The Honorable Tom Corcoran  
R.R. 2  
Ottawa, Illinois 61350

Re: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Mr. Corcoran:

The Federal Election Commission notified you on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission on October 2, 1984, determined that there is reason to believe that the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that your committee and its treasurer accepted excessive contributions from Michael Goland in the form of coordinated expenditures.

Although the committee treasurer is responsible for the acts of the committee we believe that you, as the candidate, should be made aware of this development. A copy of our letter to your committee treasurer is enclosed.

An investigation of this matter is being conducted. The attached order, which requires you to provide certain information has been issued in connection with that investigation. The Commission does not consider you to be a respondent, but rather a witness only. You are required to submit the information under oath within ten days of your receipt of this order.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express

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35040511357

The Honorable Tom Corcoran  
Page 2

written consent of the parties with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures  
Order  
Interrogatories  
Letter to Corcoran Committee

35040511358

BEFORE THE FEDERAL ELECTION COMMISSION

Tom Corcoran

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

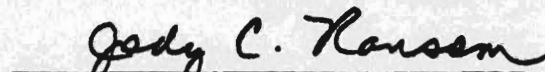
Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on *October 4*, 1984.

  
Lee Ann Elliott  
Chairman

ATTEST:

  
for Marjorie W. Emmons  
Secretary to the Commission

Attachment(s)

35040511359

FEDERAL ELECTION COMMISSION

TO: Representative Tom Corcoran  
MUR 1684

INTERROGATORIES

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain to your campaign for the U.S. Senate in Illinois and your relationship with a Morris Amitay prior to and during the campaign. You are requested to answer all questions under oath.

(1) Please state the date or approximate date on which you first met Morris Amitay?

(2) Please describe the circumstances of how you came to meet Mr. Amitay.

a) Describe your relationship with Mr. Amitay, if any, prior to your registration as a candidate to the U.S. Senate.

1. Were the two of you personal friends prior to your registration?

2. Did you see him socially?

a) If so, how often on the average?

3) Have you had the occasion to discuss this investigation with Mr. Amitay?

a) If so, state when and describe the substance of your conversation(s).

(4) Have you ever had business dealings with Morris Amitay?

a) If so, describe in detail the nature of your business dealings and state when they occurred.

b) During such dealings, how often did you speak to him for business purposes?

(5) Have you ever spoken to Mr. Amitay by telephone subsequent to your registration as a candidate for the U.S. Senate?

a) If so, how often - on the average?

b) When was the last time you spoke with Mr. Amitay by telephone?

1) What was the subject and purpose of your discussion?

(6) Please state how and when you became aware of the political action committee known as Washington PAC?

a) Describe your understanding of the purpose of the Committee.

b) State whether you have ever been a member of Washington PAC and include the dates of membership.

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c) Prior to your registration as a candidate for the U.S. Senate, were you privy to the names of any of the members of Washington PAC?

1) If so, state the names you were privy to and how you became privy to them.

d) Have you ever discussed your campaign or your campaign's strategy with any member of Washington PAC?

1) If so, when and with whom?

2) Describe the substance and content of each such discussion.

3) Who else was present at the time of each such discussions?

(7) Prior to your registration as a senatorial candidate, were you aware that Morris Amitay was a board member of Washington PAC?

a) If so, how was it that you became aware of that fact?

b) If not, when and how did you become aware of that fact?

(8) Describe your relationship with Mr. Amitay since your registration as a candidate for the U.S. Senate.

a) Do you ever see him socially?

a) If so, how often on the average?

b) Have you had business dealings with Mr. Amitay?

1) If so, how often on the average did you see and/or speak to him in relation to your business dealings?

2) Have you ever given Mr. Amitay the authority to conduct any type of business on your behalf?

3) Has Mr. Amitay ever voluntarily conducted business on your behalf?

c) Have you discussed your campaign or your campaign's strategy, goals and purposes with Mr. Amitay?

1) If so, when?

2) Describe the substance of each such discussion and/or communication.

3) Who else was present during each such discussion?

4) Was Michael Goland ever present during each such discussion?

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- d) Has Mr. Amitay ever given you advice or strategy hints relevant to your campaign?
1. If so, when?
  2. Describe the substance of the discussions or communications.
  3. Who else was present when this occurred?
- e) Have you and Mr. Amitay ever discussed the Percy candidacy or campaign?
- 1) If so, when?
  - 2) Describe the substance of each such discussion.
- f) Have you and Mr. Amitay ever discussed Michael Goland's expenditures against Senator Percy?
- 1) If so, list the date of each such discussion.
  - 2) Describe the substance and content of each such discussion.
- g) Did you speak with Mr. Amitay by telephone subsequent to your registration as a senatorial candidate?
- 1) How often on the average?
  - 2) For what purpose?
- h) Have you communicated with Mr. Amitay in writing for any reason?
- 1) If so, what was the nature of each such communication?
  - 2) Please provide the date on which each such communication occurred.
  - 3) Please describe the purpose and content of each such communication.
- (9) Have you ever appeared before Washington PAC board members?
- a) Please list the date of each such appearance.
  - b) Describe the purpose of each such appearance.
  - c) Describe in detail any contact made with Washington PAC for the purpose of arranging each such appearance.
    - 1) Was the contact by telephone, face-to-face or in writing?
      - a) With whom was contact established and on what date(s) was such contact made.
    - 2) For each such appearance; state whether Morris Amitay and/or Michael Goland were present.
    - 3) For each such appearance, state the substance of your presentation.
    - 4) Has Washington PAC or any member of Washington PAC participated in or conducted fundraisers on your behalf?
      - a) If so, who conducted the efforts and when did they occur?
      - b) What was the result of the efforts?

35040511362

(10) Were you ever interviewed by Morris Amitay?

- a) Please list the date and location of each such interview.
- b) For each such interview state:
  - 1) Who was present.
  - 2) The purpose of the interview.
  - 3) The substance of the interview.
  - 4) Whether the Corcoran campaign goals and/or strategy were discussed.
    - a) If so, describe which aspects of the Corcoran campaign were discussed during the interview.

(12) Are you aware of fundraising brochure(s) developed by the Corcoran Committee in which you and Mr. Amitay are both pictured?

- a) For each such brochure, please answer the following:
  - 1) Why Mr. Amitay's picture was selected to appear on the brochure?
  - 2) Was Mr. Amitay informed by the Corcoran Campaign that his picture was going to be used on the brochure?
  - 3) When and where was the picture used in the brochure taken?
  - 4) Was Mr. Amitay compensated for the use of his picture in the brochure?
  - 5) Whose idea was it to use the picture in the brochure?
  - 6) Did Mr. Amitay have any input into the composition of the brochure?

(13) Do you know Michael Goland?

- a) If so, state when and how you met.
- b) Describe your relationship with Mr. Goland.
  - 1) Do you see Mr. Goland socially? If so, how often on the average?
  - 2) Have you ever had any business dealings with Mr. Goland?
    - a) If so, when?
    - b) If so, how often on the average did you have contact with him in relation to those dealings?

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- c) During the time you were running for Senate, did you speak with Mr. Goland by telephone?  
1) If so, how often - on an average?
- d) Have you ever communicated with Michael Goland in writing for any reason?  
2) If so, state the date on which each such communication occurred.  
3) State the subject, purpose and content of each such communication.

(14) Have you ever discussed the following with Mr. Goland:

- 1) your candidacy?
- 2) your campaign's goals?
- 3) your campaign committee strategy?
- 4) Senator Percy's campaign?
- 5) this investigation?

(15) If the response to any portion of question 14 is yes, state the date and substance of each such discussion.

(16) During your candidacy, were you aware that Michael Goland was making substantial expenditures against the re-election of Senator Percy?

a) Please state when you learned of the expenditures and state the name of each person who told you about them and the substance of the notification.

(17) Do you know whether Michael Goland and Morris Amitay are personal friends?

- a) If so, when and how did you become aware of this information?
- b) Have you ever met with Messrs. Amitay and Goland together?
  - 1) If so, describe the nature of each such meeting including, but not limited to, the date of the meeting, the location, how the meeting was arranged and the purpose of the meeting.
- c) If there were follow-up communications regarding any or all of the meeting please state:
  - 1) the date on which each such communication occurred.
  - 2) the method by which each such communication was made

35040511364

Tom Corcoran  
Interrogatories  
MUR 1684  
Page 6

(e.g., telephone conversation, face-to-face conversation, written correspondence).

3) the name of each person involved in the communication.

4) the subject, content and purpose of each such communication.

35040511365



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 5, 1984

Steven A. Nissen, Esquire  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

Re: MUR 1684  
Michael Goland

Dear Mr. Nissen:

The Federal Election Commission notified your client, Michael Goland, on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your client, the Commission on October 2, 1984, determined that there is reason to believe Mr. Goland has violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. Specifically, it appears that he made excessive contributions, in the form of coordinated expenditures, to the Corcoran for Senate Committee.

Your client's response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. Consequently, the Commission has issued the attached order that requires Mr. Goland to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. Answers to the enclosed questions must be submitted within 10 days of your receipt of the enclosed order. All statements must be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client, 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.

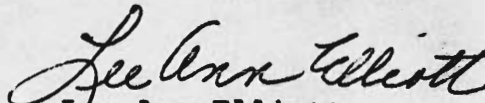
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Letter to Steven A. Nissen  
Page 2

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

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures  
Order and questions

35040511367

BEFORE THE FEDERAL ELECTION COMMISSION

Michael Goland

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on *Oct. 4*, 1984.

  
Lee Ann Elliott  
Chairman

ATTEST:

*Jody C. Ransom*  
for Marjorie W. Emmons  
Secretary to the Commission

Attachment(s)

35040511368

FEDERAL ELECTION COMMISSION

To: Michael Goland  
MUR 1684

INTERROGATORIES

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain primarily to the expenditures you made against Senator Percy in the 1984 Illinois primary and your relationship with Morris Amitay, Tom Corcoran and the Corcoran for Senate Committee. All questions are to be answered under oath.

Commission records disclose that you made substantial expenditures, which you describe as "independent expenditures," against the re-election of Senator Charles Percy of Illinois during the 1984 primary race.

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

a) State whether the funds used to make the expenditures were personal funds.

b) State whether you received contributions from others in support of your effort.

1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

(6) Did you contribute any funds in support of the Corcoran campaign?

a) If so, when and in what amount(s)?

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- b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?
- c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

(7) Do you know Tom Corcoran?

- a) If so, please state when and how you met Mr. Corcoran.
- b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.
  - 1) Did you see him socially?
    - a) If so, how often on the average?
- c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.
  - 1) Have you seen him socially?
    - a) If so, how often on the average?
- d) When and where was the last occasion you spoke with Mr. Corcoran?
  - 1) State the substance of your conversation.
  - 2) State whether you have discussed this investigation with Mr. Corcoran.
    - a) If so, state the substance of each such conversation, when it occurred and who else was present.

(8) State whether you have ever had business dealings with Mr. Corcoran.

- a) If so, describe in detail the nature of your business dealings and state when they occurred.
- b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

- a) If so, how often - on the average?
- b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

- a) If so, list the dates of your membership.

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- 1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.  
2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.  
b) Describe the circumstances of how you came to know of Washington PAC?
- (11) Did you ever speak with Tom Corcoran at the PAC's offices? For each such conversation state:
- a) When you spoke with Mr. Corcoran.
  - b) Whether it was face-to-face or by telephone.
  - c) The nature of the discussion.
  - d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
  - e) Whether you had begun to make expenditures against Senator Percy's campaign.
  - f) Whether you had made any contributions to the Corcoran campaign.
- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?
- a) If so, when?
  - b) Describe the substance of each such discussion and communication.
- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?
- a) If so, when?
  - b) Describe the substance of each such discussion and communication.
- (14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?
- a) If so, describe what assistance you provided his campaign.

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(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

a) Describe your relationship with Mr. Amitay.

1) Do you see each other socially?

a) If so, how often on the average?

2) When and where was the last occasion you saw or spoke with Mr. Amitay?

a) On that occasion, what was the substance of your discussion?

3) Have you discussed this investigation, with Mr. Amitay?

a) If so, when and what was the substance of your conversation(s)?

(18) Did you ever have business dealings with Mr. Amitay?

a) If so, describe in detail the nature of your business dealings and state when they occurred?

b) How often did you speak to him for business purposes during such dealings?

(19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

a) If so, how often - on the average?

b) When was the last time you spoke with Mr. Amitay by telephone?

1) What was the subject and purpose of your discussion?

(20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

a) If so, when did the presentation(s) occur?

1) Did you ever speak with Tom Corcoran following his presentation?

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a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran? If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

- a) If so, list the date(s) of the interview(s).
- b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?
- c) What input did you have in the coordinating or arranging of the interview(s)?
- d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

If so, for each such discussion state:

- a) When and where the discussion took place.
- b) The substance of the discussion.
- c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- a) If so, when and where did these discussions take place?
- b) Describe the content and substance of each such discussion.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

- a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

- a) If so, for each occasion on which such advice was given state:
  - 1) the date the advice was given.
  - 2) the substance of the advice.

35040511373



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Steven A. Nissen, Esquire  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

Re: MUR 1684  
Michael Goland

Dear Mr. Nissen:

The Federal Election Commission notified your client, Michael Goland, on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your client, the Commission on , 1984, determined that there is reason to believe Mr. Goland has violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. Specifically, it appears that he made excessive contributions, in the form of coordinated expenditures, to the Corcoran for Senate Committee.

Your client's response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. Consequently, the Commission has issued the attached order that requires Mr. Goland to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. Answers to the enclosed questions must be submitted within 10 days of your receipt of the enclosed order. All statements must be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client, 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.

Letter to Steven A. Nissen  
Page 2

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

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

*[Handwritten signature]*  
10/3/14

Enclosures  
Order and questions

35040511375



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 2667  
Aurora, Illinois 60507

RE: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Keck:

The Federal Election Commission notified you on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time. We acknowledge receipt of your explanation of this matter which was dated May 18, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe the Corcoran for Senate Committee and you, as treasurer, have violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that the committee and you, as treasurer, accepted excessive contributions, in the form of coordinated expenditures, from Michael Goland. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such materials within ten days of your receipt of this notification. All statements should be under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you and 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.

35040511376

Letter to William Keck  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

*8/27*  
*10/3/4*

cc: Representative Corcoran

35040511377



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Steven A. Nissen, Esq.  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

RE: MUR 1684  
Morris Amitay

Dear Mr. Nissen:

On May 7, 1984, the Commission notified your client, Morris Amitay, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time.

Upon review of the allegations contained in the complaint and information supplied by your client, the Commission decided, on October 2, 1984, to take no action at this time with respect to any possible violation of the Act by your client.

The attached order which requires your client to provide certain information has been issued in connection with the ongoing investigation. The Commission no longer considers Mr. Amitay to be a respondent, but rather considers him a witness only. Your client is required to submit the information under oath within ten days of your receipt of this order.

If you have any questions, please direct them to Duane A. Brown, the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

*CS* 11/3/84

By Kenneth A. Gross  
Associate General Counsel

Attachments  
Order and questions

35040511378

666 3496

# MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064

TELEPHONE (213) 312-4000

TELEX 215893  
CABLE MANATOP LSA  
FAX (213) 478-0555

June 5, 1984

CHARLES T. MANATT,\*  
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ALAN I. ROTHENBERG,  
JOHN V. TUNNEY  
L. LEE PHILLIPS,\*  
BARNET REUTHER,  
WILLIE R. BARNES,  
MICHAEL KANTOR,\*  
LESLIE S. KLINGER,  
MARTIN M. JELENKO,  
JOSEPH HORACEK III,  
ARNOLD R. SCHUSTER,  
RONALD J. SILVERMAN,\*  
GEORGE DAVID KIEPPER,  
GORDON M. BAWA,  
MARC EPSTEIN,  
RICHARD LEE AUGUST,  
MARK S. GREENFIELD,  
THOMAS E. MCCLAIN,  
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K. BARRY SCHOCHET,\*  
MARY JANE LARSEN,  
PETER T. PATERNO,  
NEAL L. PETERSEN,  
ROSS T. SCHWARTZ,

LISA SPECHT,  
ROBERT L. MURPHY,  
BARRY M. LAWRENCE,  
DICKMAN TEVRISIAN,  
KEITH T. HOLMES,  
TIMOTHY R. FURLONG,\*\*  
STEPHEN S. GREENBERG,  
WILLIAM S. BRUNSTEN,  
DONALD J. FITZGERALD,  
STEVEN A. HESSEN,\*  
LAWRENCE J. ULMAN,  
JOHN B. EMERSON,  
WILLIAM T. QUIGNSILVER,  
STEVEN M. GOLDBERG,  
HARSHRO BHIMJO,  
SHIRLEY M. H. BENNETT,\*\*  
LAWRENCE J. BLANK,  
DIANE R. HOLMAN,  
MARY E. DOYLE,  
MATTHEW S. STEINBERG,  
DENNIS H. JOHNSTON,  
LAURENCE M. HARRIS,  
BARBARA J. SCHLAIN,  
SENET E. LONG,\*\*  
KATHLEEN QUINNEMVILLE,  
HUSBAND SCHALL,  
ARN M. TELLEN,  
JAMIE L. ELLISON,  
LESLIE A. SWAIN

JOHN W. COCHRANE,  
RICHARD A. KALE,  
BARBARA J. ZIPPERMAN,  
DAVID W. CRUICKSHANK, JR.,  
EUGENE TANAKA,  
CAROL LAURENCE MAYALL,  
JOY E. BRADMAN,  
DIANE J. GIDEON,  
DANIEL L. APPELMAN,  
ELIZABETH WATSON,  
PHILIP R. RECHT,  
ROGER LANE CARRICK,  
ROBERT S. GRUNER,  
CARY H. THOMPSON,  
HELEN L. DELANEY-YOHANNINE,  
STEVEN M. SIEMENS,  
MATTHEW R. GUILTER,  
BRAD A. MORRICE,  
ROBERT DOUGLAS LEE,  
CHARLES M. SHUMAKER III,  
TIMOTHY J. MOY,  
JONATHAN L. KIRSCH,  
TOR R. BRADMAN,  
DANNY BRADON,  
BARBARA D. CASEY,  
CLARE BRONOWSKI,  
ROSE D. ORS,  
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MICHAEL A. FIRESTEIN

\*MEMBER OF DISTRICT OF COLUMBIA AND CALIFORNIA BARS  
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OTHERS MEMBERS OF CALIFORNIA BAR  
A PROFESSIONAL CORPORATION

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811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-2800

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

Re: MUR 1684

Dear Mr. Steele:

This response to the above-referenced matter is submitted on behalf of Michael Goland and Morris J. Amitay.<sup>1/</sup> The complaint filed on April 26, 1984,<sup>2/</sup> by Senator Charles H. Percy and Citizens for Percy '84 alleges that independent expenditures made by Mr. Goland in opposition to Senator Percy were made in coordination and consultation with the campaign of Representative Thomas Corcoran, Senator Percy's

<sup>1/</sup> Mr. Amitay should not be considered as a respondent in this MUR. Even if all of the allegations were correct, he violated no provision of the Act or regulations.

<sup>2/</sup> This response was originally due on May 22, 1984. A 15-day extension was obtained and the response is now due on June 6, 1984.

35040511379

Charles N. Steele, Esq.  
June 5, 1984  
Page 2

opponent in the 1984 Illinois Republican primary. Complainant's contention that the expenditures should be treated not as the expression of Mr. Goland but rather as the campaign statements of Representative Corcoran is based solely on three factual allegations: 1) that Mr. Amitay was an agent of Representative Corcoran; 2) that Mr. Amitay controlled the expenditures of Mr. Goland; and 3) that Mr. Goland and Representative Corcoran used the same fundraising agent, A.B. Data.

For the following reasons set forth more fully below, these allegations are wholly without merit. First, Mr. Amitay was never an agent of the Corcoran campaign. He was not privy to Corcoran plans or strategies; in fact, he had minimal contact with Representative Corcoran and none whatsoever with individuals on his campaign. Second, Mr. Amitay did not direct or control the expenditures of Mr. Goland. The relationship between Mr. Amitay and Mr. Goland is primarily that of attorney and client.<sup>3/</sup> Finally, Mr. Goland did not use A.B. Data as a fundraising agent.

---

<sup>3/</sup> Mr. Amitay has provided a range of services to Mr. Goland, including legal advice and consulting services commencing in 1982.

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Charles N. Steele, Esq.  
June 5, 1984  
Page 3

Mr. Goland's activities were carefully conducted in accordance with the applicable legal standards governing independent expenditures. Complainants have failed to present credible evidence demonstrating any relationship between Mr. Goland and Mr. Amitay on one hand and the Corcoran campaign on the other.

For these reasons, the Commission should find no reason to believe that there was a violation of the Federal Election Campaign Act or of the Commission's regulations.

I. Independent Expenditures Are a Form of  
Constitutionally Protected Speech

The right of an individual to make independent expenditures from his own funds is a form of speech protected by the First Amendment. In Buckley v. Valeo, 424 U.S. 1 (1976), the Supreme Court held that governmental restrictions on such expenditures are subject to strict scrutiny. The Court stated:

[T]he independent expenditures ceiling . . . heavily burdens core First Amendment expression. For the First

95040511381

Charles N. Steele, Esq.  
June 5, 1984  
Page 4

Amendment right to "'speak one's mind  
. . . on all public institutions'"  
includes the right to engage in "'vigorous  
advocacy' no less than 'abstract discus-  
sion". . . . Advocacy of the election or  
defeat of candidates for federal office  
is no less entitled to protection under  
the First Amendment than the discussion  
of political policy generally or advocacy  
of the passage or defeat of legislation.

424 U.S. at 42. (Citations omitted.)

In response to this articulation of the protected  
nature of independent expenditures, in 1976 Congress amended  
the Act and the Commission adopted regulations defining cir-  
cumstances under which expenditures are so closely linked to  
a candidate that they no longer enjoy the Constitutional  
protections of Buckley. Thus, under the FECA, an independent  
expenditure is defined as:

an expenditure by a person expressly  
advocating the election or defeat of a  
clearly identified candidate which is  
made without cooperation or consultation  
with any candidate or any authorized  
committee or agent of such candidate,  
and which is not made in concert with,  
or at the request or suggestion of, any  
candidate, or any authorized committee  
or agent of such candidate.

85040511382

Charles N. Steele, Esq.  
June 5, 1984  
Page 5

2 U.S.C. Section 431(17). The legislative history of the  
1976 amendments states that:

The definition of the term "independent  
expenditure" in the conference substitute  
is intended to be consistent with the  
discussions of independent political  
expenditures which was included in  
Buckley v. Valeo.

Report of Committee of Conference on S. 3065, H.R. Rep. No.  
94-1057, 94th Cong., 2nd Sess. 38 (1976).

Based on this statutory definition, the Commission  
in its regulations further defined the standard governing  
independent expenditures as, inter alia,

Any arrangement, coordination, or direc-  
tion by the candidate or his or her agent  
prior to the publication, distribution,  
display, or broadcast of the communica-  
tion. An expenditure will be presumed  
to be so made when it is

(A) Based on information about the  
candidate's plans, projects, or needs  
provided to the expending person by the  
candidate, or by the candidate's agents,  
and with a view toward having an expendi-  
ture made;

(B) Made by or through any person  
who is, or has been, authorized to raise  
or expend funds, who is, or has been, an  
officer of an authorized committee, or

35040511383

Charles N. Steele, Esq.  
June 5, 1984  
Page 6

who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent.

11 C.F.R. Section 109.1(b)(4)(i).

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The Complaint argues that two of these criteria demonstrating coordination are present in this case -- (1) that the expenditures were made in cooperation with an agent of the candidate and (2) that the expenditures were made through a common fund-raising agent. Neither of these contentions are factually correct. In fact, Mr. Goland took great care to assure that his activities fell well within the scope of the core First Amendment expression the Supreme Court has deemed protected and that he did not engage in activities which the Commission has determined would suggest that his speech is sufficiently linked to a candidate's campaign to support a conclusion that it was coordinated with it.

II. The Expenditures by Mr. Goland Were Independent

Michael Goland determined to engage in public advocacy making known his views in opposition to the re-

Charles N. Steele, Esq.  
June 5, 1984  
Page 7

election of Senator Percy. To this end, he planned a series of independent expenditures through both media advertising and direct mailings. Mr. Goland properly reported all of his independent expenditures. The telegrams submitted in accordance with the reporting requirements of the Act reflect that he made expenditures totalling \$152,090 for radio and television ads opposing Senator Percy's re-election, and \$127,639.60 for mailings opposing his re-election. Exhibits 4, 4a, 10 and 10a to Complaint.

The initial idea as well as the decision to make the independent expenditures against Senator Percy during the Illinois Republican primary were solely those of Mr. Goland. (Statement of Michael Goland, Exhibit A). Mr. Goland made this decision based on his dissatisfaction with actions taken by Senator Percy as a U.S. Senator and as Chairman of the Senate Foreign Relations Committee. It is precisely these types of expenditures which the Court in Buckley, supra, sought to protect.

Mr. Goland was not concerned with who succeeded Senator Percy. Rather, his interest was limited to Senator Percy's defeat. To convey his message, Mr. Goland personally

85040511385

Charles N. Steele, Esq.  
June 5, 1984  
Page 8

designed the format and content of the expenditures. He did not seek approval of the advertisements from Mr. Amitay or any other person. (Statement of Michael Goland, Exhibit A).

Mr. Amitay is an attorney in Washington who has advised Mr. Goland over a number of years -- commencing long prior to the independent expenditures made by Mr. Goland -- on a wide range of legal and business matters. When Mr. Goland was considering making the independent expenditures in question, he asked Mr. Amitay to advise him on FEC requirements applicable to independent expenditures, including reporting requirements. Mr. Amitay did, in fact, provide such advice. (Statements of Mr. Goland and Mr. Amitay, Exhibits A and B.)

The Complainants have attempted to distort this minor advisory role Mr. Amitay played in Mr. Goland's decision by suggesting that Mr. Amitay "controlled" Mr. Goland's expenditures. The only evidence in the complaint supporting this contention is a handwritten note by Mr. Amitay responding to an informal telephone request from the Republican Senatorial Campaign Committee to identify possible Republicans on the Washington PAC advisory board. Next to the circled

95040511386

Charles N. Steele, Esq.  
June 5, 1984  
Page 9

names on a sheet of Washington PAC letterhead, Mr. Amitay scribbled "no one makes a move without my o.k." Exhibit 8 to Complaint. In fact, Mr. Goland was no longer actually on the Board, since he had made no contributions since July of 1982.

Both the context and tone of the comment make it clear that it was offered in jest. Moreover, the note was not directed specifically to any particular one of the many names circled by Mr. Amitay. The note certainly had no connection to Mr. Goland's independent expenditures and provides no evidence whatsoever of control over any of Mr. Goland's political expenditures. It offers absolutely no proof of Complainant's broad assertion that Mr. Amitay directed Mr. Goland's expenditures in Illinois.

III. Mr. Amitay Was Not an Agent of the Corcoran Campaign.

The Complaint does not even suggest that Mr. Goland had any direct contact with Representative Corcoran or his campaign. Indeed, Mr. Goland has not had any contact with Representative Corcoran or his campaign. Since Mr. Goland

35040511387

Charles N. Steele, Esq.  
June 5, 1984  
Page 10

scrupulously abided by the provisions of the Act and the Commission's regulations on independent expenditures, the Complainants are reduced to grasping at some other possible basis for linking Mr. Goland's expenditures with the Corcoran campaign. Lacking any better pretext, Complainants have seized upon the two or three contacts among Mr. Goland's attorney, Mr. Amitay, and Rep. Corcoran as the basis for their allegation that Mr. Goland's expression should be treated as part of the Corcoran campaign.

Mr. Amitay is an attorney in Washington, D.C. -- with offices on Capitol Hill -- who has represented Mr. Goland in a number of legal and business matters. Mr. Amitay also is the treasurer of the Washington Political Action Committee ("Washington PAC") and a columnist who regularly reviews and comments on election contests. Samples of his columns and Washington PAC newsletters are attached. (Exhibits C & D.) It was in these two contexts that Mr. Amitay had his only tangible contacts with Rep. Corcoran. (Statement of Mr. Amitay, Exhibit B.) Mr. Amitay had no official or unofficial advisory position with the Corcoran campaign; he never raised funds for the Corcoran campaign, nor did he ever have

35040511388

Charles N. Steele, Esq.  
June 5, 1984  
Page 11

contact with anyone on the campaign other than Rep. Corcoran himself.

A. Washington PAC

3 5 0 4 0 5 1 1 3 8 9  
In December, 1982, when Rep. Corcoran was considering whether or not to run for Senate, he contacted Amitay as Washington PAC's treasurer. On April 6, 1983, he attended a Washington PAC luncheon. These luncheons are held regularly and are attended frequently by candidates seeking contributions. Washington PAC contributed a total of \$5,000 in five separate contributions to the Corcoran campaign. As demonstrated by the attached list (Exhibit E), this is a common contribution pattern by Washington PAC to maximize contact with recipients of contributions. At least eight other candidates have been given identical amounts consistent with this pattern.

The appearance of Rep. Corcoran at the luncheon and the contributions by Washington PAC do not demonstrate that Mr. Amitay was an agent of the Corcoran campaign. On the contrary, it is clear that these contacts occurred solely because Rep. Corcoran, as is the case with more than one

Charles N. Steele, Esq.  
June 5, 1984  
Page 12

hundred candidates, sought contributions during this election season from Washington PAC.<sup>4/</sup> Specifically, Mr. Amitay was the individual to contact for Washington PAC, since he is its only officer aside from its Board members. The logical extension of complainant's argument would be that a treasurer of any political committee would automatically become an agent of every candidate to whom the committee makes a contribution. Nothing in the statute, the Commission's regulations or other precedent would support that contention.

B. The Interview

Since June, 1982, Mr. Amitay has regularly published columns reviewing various election races. (Statement of Mr. Amitay, Exhibit B.) In the course of reviewing candidates and their records and through his regular attendance at fundraisers and events, Mr. Amitay meets with all of the candidates who seek support from Washington PAC. When Rep. Corcoran first sought PAC support for his campaign, Mr. Amitay was not familiar with his record or his views on issues of

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<sup>4/</sup> Correspondence from Mr. Amitay's files demonstrates that these contacts were in Mr. Amitay's capacity as treasurer of the PAC. (Exhibit F.) The reference in the second letter, to the best of Mr. Amitay's recollection, was to make arrangements for the interview.

35040511390

Charles N. Steele, Esq.  
June 5, 1984  
Page 13

particular interest to the PAC or to Mr. Amitay's readers. To gain more understanding of Rep. Corcoran's positions and to allow Mr. Amitay to report on those positions in his column, Amitay conducted the interview attached to the complaint as Exhibit 5. The complaint alleged that this interview demonstrates that Mr. Amitay was an agent of the campaign. On the contrary, it confirms that Mr. Amitay's relationship to the Corcoran campaign was that of an outsider seeking information about the Corcoran candidacy rather than an agent guiding it. Subsequent use of portions of this interview, and a photograph taken at the time, in an insert in a fundraising letter was done solely at the discretion of the Corcoran campaign, which correctly identified Amitay as a "syndicated columnist."

C. News Reports 5/

Other than possible casual encounters with Rep. Corcoran at social gatherings or on Capitol Hill, these are

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5/ Newspaper articles may serve as the basis of a complaint only if they meet the standards set forth in 11 C.F.R. Section 111.4. The retraction of the newspaper articles used as the basis for this complaint proves their inaccuracy. These articles may not, therefore, be considered as sufficient to sustain a complaint.

35040511391

Charles N. Steele, Esq.  
June 5, 1984  
Page 14

35040511392

the only contacts between Mr. Amitay and Rep. Corcoran. The only other "evidence" in the complaint on this question consists of two news accounts, one describing Mr. Amitay as a fundraiser and advisor to the Corcoran campaign and the other as "supporting" Rep. Corcoran. (Statement of Mr. Amitay, Exhibit B.) The first account was inaccurate and was retracted prior to the filing of this complaint. (Statement of Mr. Amitay, Exhibit B.) The second referred to Mr. Amitay's "supporting" Corcoran -- and nothing else. News articles have been properly deemed by the Commission as having only limited probative value. These two isolated references (one of which was subsequently retracted as false) are worthless as evidence in this matter. If considered at all as probative of anything, the retracted article proves only the great care of both Mr. Goland and Mr. Amitay to avoid even the appearance of substantive contact with Rep. Corcoran.

IV. A.B. Data Was Not a Fundraising Agent for Goland

A.B. Data was not a fundraising agent within the meaning of 11 C.F.R. Section 109.1(b)(4) and (5).<sup>6/</sup> A fund-

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<sup>6/</sup> Only \$27,639.60 of Mr. Goland's expenditures were made through A.B. Data. Thus, the complaint's alleged "A.B. Data Connection" is applicable only to the expenditures related to these particular mailings.

Charles N. Steele, Esq.  
June 5, 1984  
Page 15

raising agent is an individual or firm which is retained to raise funds for a committee. A vendor from whom a mailing list is procured is not a fundraising agent.

As stated above, the content and timing of the mailings by Mr. Goland were conceived of and designed by him alone. He used A.B. Data's services only for its mailing list and for the actual mailing. See A.O. 1979-80 (situation 6). Mr. Goland consulted with Mr. Amitay on the choice of a direct mail house in order to reach the appropriate voters. Mr. Amitay recommended A.B. Data, which is widely recognized as possessing the best list to reach the voting population concerned with the issues addressed by Goland in this independent expenditure. (Statement of Mr. Amitay, Exhibit B). Mr. Goland knew the President of A.B. Data, Jerry Benjamin. (Statement of Mr. Benjamin, Exhibit G.) Contrary to the complaint's suggestion that A.B. Data was one of many possible mailing firms, it was the only available choice, based on past experience of Amitay and general knowledge, for the particular mailing.

A.B. Data could not possibly be deemed a fundraising agent for Mr. Goland, since its mailing on his behalf did

35040511393

Charles N. Steele, Esq.  
June 5, 1984  
Page 16

not raise any funds. In any event, the expenditures were entirely independent. The regulations merely create a presumption that expenditures made through a common fundraising agent are not independent. 11 C.F.R. Section 109.1(b)(4)(i). Since Goland designed his own ads, and since there was no coordination at A.B. Data of Goland's and Corcoran's expenditures (Statement of Mr. Benjamin, Exhibit G), this presumption would be rebutted even if A.B. Data were a fundraising agent.

Conclusion

The independent expenditures made by Mr. Goland satisfied all of the requirements of 11 C.F.R. Section 109. As set forth in this response and supporting exhibits, complainant has failed to establish any facts supporting a conclusion that these expenditures were made in cooperation, consultation or at the request or suggestion of the Corcoran campaign. For the foregoing reasons, the Commission should

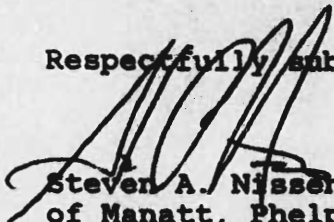
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MANATT, PHELPS, ROTHENBERG & TUNNEY

Charles N. Steele, Esq.  
June 5, 1984  
Page 17

find no reason to believe that a violation of the Act has  
occurred.

Respectfully submitted,



Steven A. Nissen  
of Manatt, Phelps,  
Rothenberg & Tunney

SAN22E-2

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STATEMENT OF MICHAEL GOLAND

1. My name is Michael Goland. I reside at 10982 Roebling Avenue, Los Angeles, California 90024.

2. This statement is made in support of the response of Michael Goland and Morris Amitay to the complaint filed on April 26, 1984, by Senator Charles H. Percy and Citizens for Percy '84 (MUR 1684).

3. I have known Morris Amitay since 1981. He has given me legal and consulting advice on a variety of business matters during that time. At no time has he controlled or directed any political expenditure or contributions made by me.

4. Around June 1983, I contacted him for advice concerning proposed independent expenditures that I intended to make against Senator Charles H. Percy. He advised me concerning FEC requirements. At my request, he also advised me that A.B. Data provided the best mailing list to reach voters concerned with the issues which I wanted to address in my independent expenditures. I had known its president, Jerry Benjamin, prior to this time.


5. The idea and decision to make independent expenditures in opposition to Senator Percy in the Illinois Republican primary was entirely my own. I designed the content and timing of the advertisements on my own. I retained A.B. Data solely for its mailing list and mailing

services; at no time did A.B. Data serve as a fundraising agent for me.

6. I have never met or spoken with Representative Corcoran. I have not, to the best of my knowledge, had any contact with any representative of the Corcoran campaign.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.

Executed on this 5th day of June, 1984 at Los Angeles, California.

  
MICHAEL GOLAND

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STATEMENT OF MORRIS J. AMITAY

1. My name is Morris J. Amitay. I reside at 4712 Sunflower Drive, Rockville, Maryland, 20853. I am a member of the Bar of the District of Columbia.

2. This statement is made in support of the response of Michael Goland and Morris Amitay to the complaint filed on April 26, 1984, by Senator Charles H. Percy '84 and Citizens for Percy '84. (MUR 1684).

3. Since November 1980, I have served as treasurer of the Washington Political Action Committee ("Washington PAC"), a multi-candidate committee. Washington PAC makes contributions to a large number of federal candidates who support a credible U.S. defense and foreign policy.

4. I was contacted by Rep. Thomas Corcoran in December, 1982, in my capacity as treasurer of Washington PAC. Congressman Corcoran informed me he was considering running as a candidate for Senate in the 1984 Illinois Republican primary and requested assistance from the Washington PAC. On April 6, 1983, Representative Corcoran attended a Washington PAC luncheon. Candidates seeking contributions from Washington PAC frequently attend similar monthly luncheons to speak and meet with members of the advisory board of the PAC. Washington PAC made 5 contributions to Rep. Corcoran's campaign totalling \$5,000, the same practice used with at least eight other

EXHIBIT " B "

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candidates. The letter of February 9, 1983, from Rep. Corcoran to me demonstrates that our contacts were in this context. (Exhibit F, page 1.)

5. In the past two years I have written bi-weekly columns reviewing election contests and other political events for various publications. I also edit the Washington PAC newsletter. Around March 1983, I interviewed Rep. Corcoran. Although I do not recall all of the details concerning the interview, to the best of my recollection, this interview was conducted in connection with my work as a columnist since I was not very familiar with Rep. Corcoran's policies or record. I wanted an opportunity to learn more about his record and stand on issues of concern to my readers. My letter of April 7, 1983 to Rep. Corcoran references, to the best of my recollection, my interest in arranging an appointment for the interview, and I had no knowledge of how and what portions of it would be used later. (Exhibit F, page 2.)

6. At no time have I been an agent, advisor or fund raiser for the Corcoran campaign. The news account attached to the complaint as Exhibit 6 merely states I was supporting him on the basis of our PAC's contributions. Exhibit 7, which described me as advising and fund raising, was erroneous and was retracted in a subsequent issue of the Baron Report before the complaint was filed. (Exhibit H)

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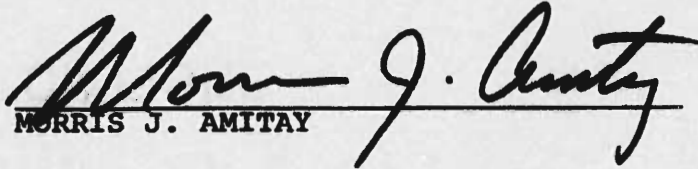
7. My relationship with Michael Goland is in a legal and consulting capacity and began long before any independent expenditures by him. Around June 1983, he contacted me concerning his intention to make independent expenditures against Sen. Charles H. Percy. I advised him concerning FEC requirements for independent expenditures and reporting requirements, emphasizing he must have no contact with any candidate's campaign. I did not suggest or request that Mr. Goland make any such expenditures, nor did I suggest the content of the advertisements run by Mr. Goland. Since I had no knowledge of the campaign plans or strategies of the Corcoran campaign, I could not and did not inform him of any such plans or strategies.

8. Mr. Goland sought my advice concerning the location of the best mailing list to reach voters concerned with the issues involved in his expenditures. I advised him that A.B. Data possessed the best list for this purpose. See Exhibit G, I.

9. Exhibit 8 to the Complaint does not demonstrate that I "controlled" Mr. Goland's expenditures. I had been contacted by someone from the Republican Senatorial Campaign Committee concerning the identities of Republicans on the Washington PAC board. I circled the name of a dozen individuals on the letterhead and forwarded it with a handwritten note with an obviously facetious comment, with no particular significance, as to "controlling" these individuals' political

expenditures. Mr. Goland, in fact, was no longer officially on the Board at the time since he had not made a contribution to the PAC since July of 1982.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.

  
MORRIS J. AMITAY

Executed on  
June 6, 1984.

## Report From Washington

By Morris J. Amltay

With less than four months to go before the November federal elections, it is important to remember that support for Israel in the U.S. Congress will remain a crucial factor in American foreign policy in the Middle East and in sustaining diplomatic and economic support for Israel. That is why it is vital to know where the candidates stand on the issues, what their prospects are — and to act accordingly. We will cover all of the 33 Senate races and some of the key House races starting with the Senate alphabetically by state. Future columns will be devoted to the rest of the Senate, and selected House of Representatives elections. Active involvement in the political process of our country should be a vital function of the American Jewish community.

### Arizona

First term Senator Dennis DeConcini (D), who faces a potentially difficult reelection effort, holds an important position on the

Foreign Operations Subcommittee which has oversight on the foreign aid appropriations bill. DeConcini has opposed sophisticated arms sales to Israel's foes and is in favor of strong U.S. — Israel relations. Little is known of DeConcini's possible Republican challengers in terms of their positions vis-a-vis the Middle East.

### California

Neither Republican Mayor of San Diego, Pete Wilson, nor Democratic Governor Jerry Brown, who are trying to succeed retiring Senator S.I. Hayakawa, have Congressional voting records on Middle East issues. Public statements, however, give an indication as to future positions. Throughout his career, Jerry Brown has expressed strong support for close U.S. — Israel ties. Most recently, he reaffirmed his opposition to sales of advanced arms to Jordan and Saudi Arabia. While Wilson has also voiced support for Israel in

his campaign, he gave public support to the sale of AWACS and F-15 enhancement equipment to Saudi Arabia. The early lead is clearly held by Wilson, but political pros expect a strong effort by Brown, and this race will probably be very close.

### Connecticut

The Connecticut Senate race is shaping up as one of the most crucial races nationwide. Incumbent Republican Senator Lowell Weicker is running for a third term and is drawing challenges from within his own party and the Democratic party. Weicker, who has had a consistent and outstanding record of strong support for Israel, is being challenged by Prescott Bush, brother of V.P. George Bush, for the GOP nomination, and by Rep. Toby Moffett (D) in the general election. Despite recent good public relations, Moffett is remembered for his 1980 meeting with Yasser Arafat, his mixed record on foreign aid, and particularly his vote (one of only 33) in favor of a \$200 million cut in aid to Israel in 1979. In a late June poll by a Hartford TV station, Weicker and Bush came out even in a GOP primary, and Weicker led Moffett narrowly in a general election matchup. Moffett easily beat Bush in a two way race. These results buoyed the Weicker camp as they pushed toward the July 26 GOP convention, where Bush will have to receive 25% to gain a place on the September primary ballot.

### Delaware

Incumbent Republican Senator William Roth is running for a third term and is favored to retain his seat

over Jewish Democratic challenger David Levinson, a local real estate developer and ADL activist. Roth has both voted against the F-15s to Saudi Arabia in 1979 and was one of only five incumbent Republicans running who voted against the AWACS. The state of the economy could significantly affect this race, although Levinson must campaign non-stop until November to overcome his low name recognition. Roth is favored.

### Florida

Democratic Senator Lawton Chiles is a good bet to retain his Senate seat for a third term, as the GOP has failed to muster a strong candidate to challenge him. A strong supporter of Israel over the years and a member of the Appropriations Committee, Chiles should be able to beat any of the three Republican candidates who will be facing him in the September primary.

### Hawaii

First term Democratic Senator Spark Matsunaga has faded off any primary challenge in this fairly Democratic state and is not expected to face a strong contender in the November general election. Matsunaga has been a strong and consistent supporter of Israel and has the backing of Hawaii's small but active Jewish community.

### Indiana

Incumbent Republican Senator Richard Lugar, a member of the Senate Foreign Relations Committee, is facing his first reelection fight against a strong Democratic opponent, Representative Floyd Fithian. Fithian decided to challenge Lugar on the

basis of the Reagan economic program's impact on Indians. While generally supportive of foreign aid legislation, on the two major controversial issues of sales of sophisticated weapons to Saudi Arabia, Lugar supported the sales both in the Foreign Relations Committee and on the Senate floor. Fithian, who has a mixed record on foreign aid, voted against the sale of AWACS and F-15 enhancement equipment last year in the House, and was active in his opposition. At this time Lugar is the clear favorite, but Fithian cannot be ruled out of the race.

### Maine

In Maine, Democratic George Mitchell, who was appointed to fill out Muskie's unexpired term, is being challenged by Republican Representative David Emery, a four term Congressman. Mitchell, who is of Lebanese-American extraction, has been very supportive of strong U.S. — Israel relations in his two years in the Senate. He actively opposed the sale of AWACS and F-15 enhancement equipment to Saudi Arabia and voted in favor of foreign aid legislation or on any other initiative favorable to Israel. Early in the race, Emery was the heavy favorite to easily defeat Mitchell. Recently, however, Mitchell has come on much stronger and the race is now considered dead even.

ASSAM and the Soviets are so close to taking over direct leadership of the PLO by replacing Arafat with their own hand-picked leader. Any chance of Syrian and PLO compliance with the terms of the Lebanon-Israel troop withdrawal accord have been shattered by the latest turn of events.

Obviously there will be no early PLO or Syrian compliance with the terms of the withdrawal accord while Arafat's loyalists are engaged in a pitched battle with mutinous elements backed by the Soviet-controlled Syrians.

Whatever the outcome of Arafat's current time of troubles, it is obvious that the PLO can no longer claim to represent the vast majority of the Palestinian Arabs either in Lebanon or in the West Bank or Gaza. He has been discredited and his organization has been exposed as a faction-ridden and bankrupt group of assassins and terrorists who cannot even trust each other or its Arab allies.

The PLO should no longer be given serious consideration as a potential partner to the Mideast negotiations, and it is hoped that moderate Palestinian leadership willing to make peace with Israel will soon feel it possible to enter the peace process.



'And The Loser Is ...'

## Jewish Issues Heat Up Campaign

By MORRIS J. AMITY

WASHINGTON — The national political scene as it relates to Jewish concerns is heating up with new statements and endorsements here in the nation's capital.

Sen. John Glenn (D., Ohio) received the public endorsement for his Presidential candidacy from fellow-Democrat Paul Tsongas of Massachusetts, his colleague on the Senate Foreign Relations Committee. Among those who know how the Committee lines up on Israel-related issues, Tsongas and Glenn were described by a former staff member of the committee as "two peas in a pod."

Both have in the past been outspoken supporters of Israel at home. Tsongas, in particular, has been extremely critical privately and in closed committee sessions of the Israeli government and its policies in the so-called West Bank and in Lebanon. The endorsement of Glenn can be contrasted with Sen. Paul Sarbanes' endorsement of Walter Mondale. Sarbanes has been a tenacious and consistent supporter of Israel over the years, and perhaps its most unwavering friend on the Democratic side of the Committee. Before announcing his own support for Mondale, Sarbanes sought to make certain that Mondale's views and record on the Middle East matched his own.

Glenn, who has publicly acknowledged his difficulties with the American Jewish community over Israel, once again sought to allay fears by a recent statement to the Near East Report — the pro-Israel Washington-based weekly.

His statement, however, almost pointedly ignored those specific issues which rekindled the very same fears after his February speech in Cleveland to a national Jewish audience, specifically: sophisticated arms sales to hostile Arab countries, a unilateral Israeli freeze on West Bank settlements, and his curious contention that the now defunct Reagan Plan was based on the Camp David process. The latest statement we have from Glenn is a fine general statement of support for Israel and a proper criticism of the Reagan Administration for neglecting Israel as an ally. But there are still a large number of key unanswered questions, and a spotty record in the past which leaves doubts. Mondale is due to release his own statement to the same publication, and undoubtedly both will be compared. However, Mondale's total record over the years, along with his close ties to the American Jewish community and Israel's leadership may speak more loudly than his words.

It is interesting to note that with the recent attention being given to the importance of black and Hispanic voters in the upcoming Presidential election, Jewish voters, who vote disproportionately higher than any other group, still are a key element in any electoral college strategy. In such states as New York, California, Illinois, Maryland, New Jersey, Ohio, Pennsylvania and Florida, a marked shift in the percentage of Jewish votes has a significant impact on the total votes of these crucial states.

For instance, a shift of Jewish votes in New Jersey from 40 percent to 45 percent Democratic over Republican, to 50 percent — 50 percent would shift the state's entire vote almost 2.5 percent — a significant number. In this regard, it is interesting to cite the approximate split of the Jewish vote in Presidential elections since 1952:

|      |                          |     |
|------|--------------------------|-----|
| 1952 | Strom Thurmond (R)       | 40% |
|      | Dwight D. Eisenhower (R) | 40  |
| 1960 | John F. Kennedy (D)      | 10  |
|      | Lyndon B. Johnson (D)    | 10  |
| 1964 | John F. Kennedy (D)      | 10  |
|      | Lyndon B. Johnson (D)    | 10  |
| 1968 | Hubert H. Humphrey (D)   | 10  |
|      | Richard M. Nixon (R)     | 17  |
|      | Wallace (AIP)            | 2   |

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## e Editor

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To the Editor:  
We at the Missouri Lodge of B'nai B'rith, are extremely proud of our Great Grandfather Morley Glushter.

His memorable achievements at the 1932 Senior Olympics, as reported in your newspaper, were as follows: gold medal, 50-meter dash; silver medal, 100-meter dash; silver medal, 1-mile fast walk; bronze medal, standing broad jump; bronze medal, co-ed volleyball; fourth-place ribbon, running broad jump.

Many people at his age cannot get out of their rocking chair. Morley says, "If your mind is young, your body will be too!"

Harvey Protzel  
Lodge President

## Find Contest Winner Named

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The June puzzle contained a total of 43 listings of towns, cities, land- and countries found in the Bible. They were: Ab: Abram; Am: Amur; Can: Canaan; Cush; Dam: Damascus; Dan, Dor; Edom; Eglon; Egypt; Elam; Gaza; Gilad; Gilgal; Gomorrah; Goshen; Hazor; Hebron; Merib; India; Israel; Jericho; Jerusalem; Jezreel; Lebanon; Luz; Lydia; Madon; Media; Meneb; Mod; Ophir; Persia; Salem; Samaria; Shushan; Sides; Sin; Sodom; Syria; Tyre; Ur.

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# report from Washington

BY MORRIE AMITAY

This column will present information, and analyses of events here in Washington which should be of interest to American Jews. I hope it will not only inform its leaders, but stimulate them to greater community and political involvement. We hope the only bias shown is in favor of a more involved Jewish community and a strong secure Israel. After all, one supports the other.

.....

In the 1980 Congressional elections such staunch supporters of Israel in the U.S. Senate as Jack Javits of New York, Frank Church of Idaho, Birch Bayh of Indiana, Dick Stone of Florida and John Durkin of New Hampshire were defeated in their reelection bids. The loss of these Senators on key committees has been incalculable. Javits, in the Republican-controlled Senate would have been Chairman of the Foreign Relations Committee (instead of Charles Percy) — and Church, its former Chairman, the ranking Democrat. Bayh and Durkin were on the Appropriations Committee, and Stone, Chairman of the Middle East Subcommittee.

This year a large number of pro-Israel stalwarts must face the voters in November. Such well-known democrats as Scoop Jackson of Washington State, Pat Moynihan of New York, Ted Kennedy of Massachusetts and Howard Metzenbaum of Ohio are up, and their reelection prospects look good at this point. But a number of lesser-known, but strong supporters face more

difficult races. These include Dennis DeConcini of Arizona, Don Riegle of Michigan, George Mitchell of Maine, Jim Sasser of Tennessee and Paul Sarbanes of Maryland (who serves on the Foreign Relations Committee). On the Republican side, with only 12 incumbent seats at stake, interest is focused on such friends as John Heinz of Pennsylvania

and John Danforth of Missouri, who appear to be shoo-ins at this point. Senators David Durenberger of Minnesota and Lowell Weicker of Connecticut who have tougher races. Weicker, who has been an outspoken supporter of Israel, first faced a challenge in the Republican primary

from Prescott Bush, brother of the Vice-President and then a Democratic foe in November. As the November elections draw nearer we will provide more detailed information on these and other Senate races — as well as key House contests.

.....

When journalist Steve Isaacs wrote his "Jews and American Politics" in the early 1970's there were two Jewish Senators and eleven House members. Today, in the 97th Congress there are six Jewish Senators and twenty-seven House members. These statistics — plus the large number of Jewish candidates from every region in the country now running for Congress — disprove the thesis that American Jews prefer to work behind the scenes in politics and shun running for

elective office. But religious affiliation is no absolute guarantee of taking positions favored by the majority of the American Jewish community. Not all Jewish legislators vote for the foreign aid bills containing vital funds for Israel — and in two of the most dramatic Senate votes in recent years — the original sale of F-15 fighter-bombers to Saudi Arabia, and the more recent enhancement package including the AWACS, extensioner Abe Ribicoff of Connecticut in 1978, and Senators Ed Zorinsky of Nebraska and Warren Rudman of New Hampshire in October, 1981 voted with the Administration — to the disappointment of many of us.

After not quite being sure of how and with whom to structure its relationships with the Jewish community, the Reagan White House has finally made two important appointments. Coming to Washington periodically on

a volunteer basis will be Los Angeles attorney Al Spiegel. Spiegel has both impeccable Jewish and Republican credentials and was asked personally by the President to assume the task. Active in the L.A. Federation and on the national Jewish scene, Spiegel was a Reagan delegate to the Nominating Convention back in 1976. To assist him on a full-time basis will be AIPAC's Mike

Gale, who will work out of the White House Office of Public Liaison, headed by Elizabeth Dole (Kansas Senator Bob Dole's wife). Spiegel and Gale have a difficult task to improve relations and ease mutual distrust between the White House and the American Jewish community — and we should all wish them well in what some feel might be a "mission impossible."

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# Watt's 'Favor' to Israel

Two changes of key players in the Middle East picture could benefit closer U.S.-Israeli ties. Yitzhak Shamir's low-key style and cautious approach should present less of a target for Israel's detractors than his predecessor, Menachem Begin. Also, his reliance on the astute and popular Defense Minister Moshe Arens should also promote greater cooperation with the United States. However, it is the prospect of a new National Security Advisor to President Reagan that could turn out to be a significant plus.

James Watt, by resigning, has in effect made a contribution to better relations between the United States in Israel. Simply stated, Bill Clark was no great friend of Israel. Clark, with his longstanding association with the President, operated in tandem with Caspar Weinberger. This duo constituted a strong influence consistently seeking closer ties to Arab foes of Israel. At this writing, it is not known who will replace Clark, but either of the two people mentioned, Jean Kirkpatrick or Bud McFarlane, would constitute a definite improvement. (Editor's note: It was McFarlane).

We wish the new Interior Secretary well in his new tasks, and hope that his successor will better appreciate Israel's strategic value and reliability.

□ □ □

There have been developments in a number of key Congressional races worth noting. In Minnesota, Rudy Boschwitz, the vital Chairman of the Near East Subcommittee still has reason to fear a strong challenge. Congressman James Oberstar is reported to be encouraged by his testing of the waters and will probably announce his intention to challenge Boschwitz by Thanksgiving. Additionally, Skip Humphrey, Hubert's son, is considering the race. The Berlin-born Boschwitz, whose family left Germany after the Nazis came to power has been one of Israel's staunchest supporters.

Despite GOP difficulties in finding dynamic candidates, Senator Carl Levin, who serves on the Armed Services Committee, is far from safe. An aggressive well-financed GOP challenger could create serious problems for this first term Jewish Senator who has been an outspoken and effective supporter.

Although Senator Charles Percy of Illinois was recently quoted at a Saudi Arabian Embassy party as saying he was not losing any sleep over his reelection possibilities, the Chairman of the Foreign Relations Committee is bound to have some sleepless nights between now and election day. Democratic State Party Chairman, Phil Rock, launched his campaign last month, joining Rep. Paul Simon, Alex Seith and Roland Burris as the announced Democratic candidates. Analysts and polls give Rep. Paul Simon of downstate Illinois an edge in the Democratic primary contest on March 20th. Also, the polls show that Simon by far has the best chance of defeating Percy in the general election. First, Percy will have to fend off a serious Republican primary challenge from Rep. Tom Corcoran. Percy's recent

attempts to portray himself as a friend of Israel will probably not deceive the important Jewish community in Illinois who heard the same tune in 1978.

In Iowa, the latest newspaper polls show Democratic challenger Rep. Tom Harkin with a slight lead over Senator Roger Jepsen. Jepsen, one of the more conservative members of the Senate, is in a classic ideological match against one of the more liberal members of the House. This race should be one of the closest in the country. Harkin, who recently returned from a visit to Israel, is seeking Jewish support. Jepsen's flip-flop on the AWACs issues gained him notoriety in the Jewish community, even though Jepsen has tried to be supportive on a number of other Israel-related issues.

The Senate race in North Carolina will be a highly visible campaign. Senator Jesse Helms, an outspoken critic of Israel on the Foreign Relations Committee has already raised 1.7 million dollars and for several months has been attacking his likely opponent Gov. Jim Hunt with a barrage of radio and newspaper ads. Although the latest polls continue to give Hunt sizeable leads, it is far too early to make predictions. Hunt is considered friendly on Israel-related issues and is in an excellent position to replace Helms.

In Rhode Island, the ranking Democrat on the Foreign Relations Committee could be facing serious problems as Republican Rep. Claudine Schneider is actively considering a challenge. Recent polls show that Schneider leads Pell in a head-to-head contest and buoyed by these results, GOP leaders are urging her to run. Schneider has been supportive, as has been Senator Pell, who would become Chairman of the Foreign Relations Committee if the Democrats regain control of the Senate.

For some months now, political observers have been awaiting the decision of the Chairman of the Senate Appropriations Committee, Oregon's Senator Mark Hatfield, as to whether or not he will seek another term next November. At this late date, most think Hatfield will try again. If so, this long-time critic of Israel should be safe for yet another term.

Senator John Tower's unexpected announcement that he would retire at the end of his fourth term in the Senate has thrown the Texas race wide open. A number of Republican candidates have already thrown their hats into the ring, and many more are contemplating joining. For the moment, recently turned Republican Rep. Phil Gramm is gaining major financial support. Gramm has a very poor record of support on Israel-related issues, and was one of few House Democrats to support the Saudi AWACs sale. The Democrats have a number of challengers seeking the open Senate seat. Two middle-of-the-road Democrats, Rep. Kent Hance and Bob Kruegar, a former member of Congress and narrow loser to Tower in 1978, are running. Kruegar has a fine record of support, while Hance has a profile equally as poor as Phil Gramm's. With two more conservative Democratic candidates in the race, liberal State Senator, Lloyd Doggett's chances appear considerably improved.

Morris J. Amity

## Commentary

### Morris Amitay

#### Loss of Senator Jackson

The untimely and tragic passing of Sen. Henry M. "Scoop" Jackson was undoubtedly a great loss to the nation. But his steady support and contributions to Israel's security for

more than a decade were even more significant to the well-being of that small embattled country.



I had the unique opportunity to work closely with Scoop and his talented staff, namely Dorothy Fosdick and Richard Perle since early 1970 as a Senate staffer for five years — and later as head of the American Israel Public Affairs Committee.

I was able to witness the development of his personal and professional relationship with then Israel's Ambassador, and later Prime Minister Yitzhak Rabin, and Rabin's brilliant political counselor, Amos Eiran. This close friendship endured until the day Scoop died and formed the basis for Scoop's leadership in the Senate on issues affecting Israel.

It was a natural relationship. Jackson, who served in the House of Representatives during WWII, believed that in dealing with unscrupulous enemies, military strength — and the willingness to use it — was essential. Rabin, as Chief of Staff during the Six-day War embodied daring and courage in defeating superior Soviet-backed forces. Both were geopoliticians in the best sense of the word — understanding that the world was a dangerous place for democratic societies — and both were able to analyze and articulate relationships between nations with unusual perception.

From this mutual admiration came the first Jackson Amendment authorizing military sales credits for

Israel in 1971. It should be recalled that until that time, Israel received no military assistance of this kind from the US. But beyond the legal authorization, the Amendment, bitterly opposed by arch-foe of Israel, Foreign Relations Chairman William Fulbright, was a resounding statement by the Congress that the United States would provide direct military assistance to Israel.

During that period also, Jackson visited Israel and correctly predicted that the Soviet SAM missiles being installed near the Suez Canal would pose a grave threat to Israel's air operations in a future conflict. His warning — unheeded by the US Government which dismissed Israel's protests — unfortunately was borne out during the Yom Kippur War.

In the public mind, however, Jackson was identified more closely with his Freedom of Emigration Amendment. The Jackson-Vanik Amendment undoubtedly brought freedom to thousands of Soviet Jews who otherwise would still be in Russia. Ironically, the threat of the legislation, coinciding with Soviet expectations of great trade with the United States, produced greater re-

sults than the law itself.

But it was not easy convincing both Houses of Congress to pass this landmark legislation — especially while fighting a hostile Administration whose opposition was quarterbacked by the formidable Henry Kissinger. As one who negotiated the actual language of the Amendment and was present during the Jackson-Kissinger encounters, I can vouch for Jackson's cool resolve and steadfastness throughout. This, at times, in the face of wavering Congressional colleagues, and even Jewish leadership too eager to compromise. But Jackson prevailed — and Congress for the first time asserted itself in significantly affecting foreign policy.

Supporters of Israel throughout the world have cause to deeply mourn Jackson's untimely death. He set an example of conviction and action on behalf of Israel as being in the best interest of the US that will be difficult to duplicate.

In Washington on Oct. 4, there will be a special Jewish memorial service for Scoop Jackson. It will be an opportunity to express not only grief, but gratitude for a dear friend who will be sorely missed.

#### Referendum

The California Supreme Court ruled that a specially scheduled Dec. 13 referendum on a Republican-drawn reapportionment plan (the "Sebastiani" plan) was unconstitutional. This initiative, which Republicans backed in a move to regain political dominance, would have seriously affected the reelection of several outstanding pro-Israel Representatives including the veteran Henry Waxman, and key House Foreign Affairs Committee members Mel Levine and Howard Berman. Consequently, the Court's ruling should effectively preserve the reelection hopes of several key Congressional Israel supporters in the 1984 elections.

On a negative note, observers here who have been monitoring former Rep. Paul Findley's political activities now predict he may very well try to regain his House seat. Findley, who was a pro-PLO spokesman on the Foreign Affairs Committee was narrowly defeated by Democrat Dick Durbin in 1982. A re-match would undoubtedly and deservedly arouse the attention of the American Jewish community.

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## 16 REPORT FROM WASHINGTON

## A Run-Down on Congressional Election

BY MORRIS J. AMITAY

*We are continuing our summaries of the U.S. Senate races in the November elections.*

## MARYLAND

The reelection campaign of Democratic SENATOR PAUL SARBANES is one race of unusual importance. Sarbanes is an important and influential member of the Senate Foreign Relations Committee and its Subcommittee on Near East. After the

loss in 1980 of three friends from the Committee, Church, Javits, and Stone, the Sarbanes race emerges as a high priority. The major GOP challenger in the September primary is former U.S. REP. LARRY HOGAN. Judging from Hogan's record in the House, he is not expected to be particularly favorable. The Sarbanes race has been targeted by many national conservative groups, who will pour a lot of money into Maryland to defeat Sarbanes. Hogan is expected to wage a vigorous campaign, but Sarbanes is the favorite.

## MASSACHUSETTS

SENATOR EDWARD KENNEDY is running for reelection to a fourth term in the Senate. While his victory is not in doubt, Kennedy will put a great deal of effort into the campaign to enhance his status as a contender for the 1984 Democratic Presidential nomination. A long-term supporter of Israel, Kennedy has been very active in the last few years opposing arms sales to Israel's foes and supporting a strong U.S.-Israel relationship. Kennedy is challenged by Republican businessman-inventor RAYMOND SHAMIE. In his last Senate race Kennedy won with 70% of the vote, and political analysts will be looking at the size of his margin on election night.

## MICHIGAN

Incumbent Democratic SENATOR DON RIEGLE was thought to have a serious reelection problem at this time last year. The changing economic situation in Michigan and the failure of popular Republican Governor William Milliken to enter the race have combined to make reelection much more likely for Riegle. The GOP frontrunner is former U.S. REP. PHIL RUPPE, who did not distinguish himself as a particular friend of Israel. Riegle, on the other hand, has built a record of strong support for a close U.S.-Israel partnership with vocal opposition to arms sales to Israel's foes and support for U.S. foreign aid to Israel. While the Michigan race is far from over, most analysts believe that Riegle will win.

## MINNESOTA

Incumbent Republican SENATOR DAVID DURENBERGER is running for reelection after filling the unexpired term of the late Hubert Humphrey for the past four years. The September 14 Democratic primary will most likely see department store heir MARK DAYTON emerge as the challenger. Durenberger has built a solid record of support for legislation favorable to closer U.S.-Israel ties and actively opposed the F-15 enhancement package to Saudi Ara-

bia. Durenberger is considered a "corner" in GOP circles and holds a commanding lead at this time in the polls. However, the race is expected to tighten up.

## MISSISSIPPI

In a state where political analysts have tended to concede the Senate election to a twenty-five year Democratic veteran SENATOR JOHN STENNIS, a new GOP candidate, HALEY BARBOUR, Vice-Chairman of the Mississippi GOP, is raising significant funds for his campaign and has sought to build a relationship with Mississippi's small but active Jewish community. Stennis has always gone down the line with the incumbent Administration on Middle East policy, and has not been accessible. Stennis' age and Republican inroads in Mississippi could make this an interesting race.

## MISSOURI

First term Republican SENATOR JOHN DANFORTH is running for reelection and is a heavy favorite in this generally Democratic state. He has an outstanding record on issues of concern to the American Jewish community, with the exception of his vote in favor of the 1978 sale of F-15s to Saudi Arabia, which he has described as his toughest vote. In 1981 Danforth reversed himself and strongly opposed the sale of AWACS and F-15 enhancement equipment to the Saudis. As of now, there are eleven Democrats entered in the August 3 primary, with Jewish STATE SENATOR HARRIET WOODS emerging as the early frontrunner.



## CAMPAIGN '82



MORRIS J. AMITAY, a former executive director of the American-Israel Public Affairs Committee (AIPAC) and legislative aide in Congress, is currently practicing law and lobbying in Washington with offices on Capitol Hill.

EXHIBIT C  
PAGE 7

MONTANA

Incumbent Democratic SENATOR JOHN MELCHER is running for a second term against Republican LARRY WILLIAMS, an investment counselor. Williams narrowly lost to Senator Max Baucus in 1978 and has the personal finances to make this a close race. Melcher has not distinguished himself as a particularly strong supporter of Israel, although in 1978 he did vote against the sale of F-15s to Saudi Arabia. Since then, he has not voted for foreign aid legislation and in 1978 voted in favor of the AWACS. There is no reason to believe Williams' record would be any better.

NEBRASKA

First term Jewish SENATOR ED ZORINSKY (D) is running for reelection in Nebraska. A member of the Senate Foreign Relations Committee, Zorinsky is being challenged by former Vice Commander of the Strategic Air Command JAMES KECK (R). Zorinsky is one of the two Jewish Senators who voted in favor of the sale of AWACS and F-15 enhancement equipment to Saudi Arabia. In Zorinsky's case, it was especially odd after his vote against the sale in the Senate Foreign Relations Committee before the floor vote. Last fall, Keck also announced his support for the AWACS sale, but he has indicated he would vote for foreign aid. Zorinsky has consistently voted against foreign aid. Zorinsky is clearly ahead at this point.

# WASHINGTON POLITICAL ACTION COMMITTEE

400 North Capitol Street, N.W., Suite 168, Washington, D.C. 20001 • 202/347-6613

No. 14

October, 1983

## SENATE UPDATE

Since our last Newsletter during the summer, new polls and unexpected events have taken place that could dramatically alter the outcome of the 1984 Congressional elections as they affect U.S. - Israel relations.

Last month's announcement by the Republican Chairman of the Armed Services Committee, Sen. John Tower of Texas, that he would not seek reelection next November, coupled with Majority Leader Baker's announcement earlier this year that he, too, would retire, has made a Democratic takeover of the Senate in 1984 a real possibility. More importantly, it removes two powerful Senators who were not particularly helpful on Israel-related issues. However, the untimely death of Sen. Henry Jackson, one of Israel's staunchest supporters, did more than offset these gains. Jackson's death also gave the GOP an unexpected boost with the appointment of ex-Republican Governor Dan Evans to the vacant seat (see Special Election Update). Nevertheless, Democratic party strategists remain encouraged with their '84 prospects. With a number of important races shaping up, Israel's supporters will have a key role to play in electing Democratic and Republican candidates in support of Israel. An asterisk indicates PAC support.

## KEY RACES

- \***RUDY BOSCHWITZ (R-MN)** - Although the latest FEC Report shows Boschwitz has accumulated a sizeable war chest of over one million dollars, this vital Chairman of the Near East Subcommittee still has reason to fear a strong challenge. Congressman James Oberstar (D) is reported to be encouraged by his testing of the waters and will probably announce his intention to challenge Boschwitz by Thanksgiving. Additionally, the popular Secretary of State, Joan Groves, also a credible candidate, is still considering a race as is the Attorney General, Skip Humphrey, Hubert's son. And, regardless of the Democratic nominee, a possible Mondale Presidential candidacy may effect Boschwitz's reelection hopes if more Democratic voters come to the polls in support of favorite-son Mondale.

- \***CARL LEVIN (D-MI)** - Possible GOP challengers abound, but former Representative Jim Dunn is, to date, the only announced candidate. Dunn's major primary rival is expected to be Loret Ruppe, the former Peace Corps Director, who Dunn currently leads in statewide polling. Also interested is State GOP Vice Chair, Jaqueline McGregor. Despite GOP difficulties in finding a dynamic candidate, Levin, who serves on the Armed Services Committee, is far from safe; and an aggressive well-financed GOP challenger could create serious problems.

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Bernard S. White  
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Harold Ziskin

KEY  
HOUSE RACE

\*CLARENCE LONG (D-MD) - As Chairman of the vital House Appropriations Subcommittee on Foreign Operations which sets Israel's foreign aid levels, "Doc" Long has built a solid and longstanding record of support. This year, after winning by only 9000 votes in '82, the 74-year old Long is in the political battle of his life. Although no opponents have yet emerged, early support is crucial, and could mean the difference in Long's successful reelection.

SPECIAL ELECTION UPDATE

A Special Election to fill the seat vacated by the unexpected death of Henry "Scoop" Jackson, one of Israel's most supportive friends in Congress will be held November 8th. In the meantime, no fewer than thirty-four Democrat and Republican candidates have filed for their respective parties' primaries to take place on October 11. Former Republican Governor Dan Evans, who has been appointed to occupy the seat, is the clear favorite to capture the Republican primary as well as the general election.

Although Evans has had no occasion to vote on Israel-related issues, he considers himself a friend and is reported to have a good relationship with his Jewish constituency. Evans could still face a credible challenge from favored Democratic candidates Seattle Mayor Charles Royer, or Rep. Mike Lowry. The latter is in the unique position of making a Senate run without vacating the House seat he now holds. After serving two terms in Congress, Lowry has compiled a good record on foreign aid, but did not vote on the AWACS sale and has not signed the Jordan Arms Letter.

POLITICAL NOTES - Morrie Amitay

Having admitted publicly that his commitment to Israel has been suspect among pro-Israel supporters, Senator John Glenn, in a major foreign policy address before the Foreign Policy Association in New York City, delivered his most positive speech to date.

Glenn, who received much media publicity for his new approach, denounced the PLO as a "gang of terrorist thugs" and declared that the U.S. should not recognize or negotiate with them.

Additionally, Glenn stated that the U.S. should cease promoting an "evenhanded" approach in the Middle East, and instead give Israel its full commitment and support. For these remarks, Glenn deserves praise. But given his turnaround from previous positions and actions, many wonder whether the conversion is genuine or a product of his political and financial advisors' pleas.

One speech does not constitute a policy -- or a record. It is important, then, to carefully analyze Glenn's recent remarks within the context of his past statements and actions, as well as those issues he avoided. Only then, can one determine if Glenn is really the candidate with the "right stuff" as far as Israel's friends are concerned.

Former Vice President Walter Mondale also addressed a New York audience recently, in which he reaffirmed his longstanding belief in a close U.S. - Israel relationship. Mondale's remarks, particularly his unequivocal statement that as President he would move the U.S. Embassy to Jerusalem without preconditions, went little noticed. Obviously the media did not consider it news for Mondale to express pro-Israel positions, while Glenn's doing so was news.

While enunciating his support for Israel, premised on strategic, moral and historical grounds, Mondale also flatly stated he did not regard Israel's settlements as "illegal". In handling a series of questions from an audience of top Jewish leadership, Mondale demonstrated a firm grasp of complex Middle East issues and personal familiarity with all the key players.

The Glenn and Mondale speeches were aimed at a vitally important New York electorate. Although New York will have a relatively "late" primary, it is shaping up as the pivotal state in the race for the Democratic nomination where the Jewish community will have a lot to say as to who might be the next President of the United States.

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| May       | Sen. Howell Heflin (D-AK)<br>Rep. Clarence Long (D-MD)   |
| June      | Rep. Al Gore, Jr. (D-TN) (running for Baker's seat)<br>Rep. Tom Harkin (D-IA) (running against Jepsen) |
| July      | Sen. David Pryor (D-AR)  |
| September | Sen. Max Baucus (D-MT)   |

# WASHINGTON POLITICAL ACTION COMMITTEE

400 North Capitol Street, N.W., Suite 168, Washington, D.C. 20001 • 202/347-6613

No. 15

December, 1983

## 1984 SENATE RACES UPDATE

**\*HOWELL HEFLIN (D-AL)** - Still considered to be one of the safest incumbent Democrats up for reelection, Heflin should have only minor opposition next November. The only announced Republican candidate is a neurosurgeon from Montgomery, which prompted a paper to suggest that it "is not inappropriate considering that the Senate frequently shows evidence of nerve impairment." Heflin has been an unusually strong Southern supporter on Israel-related issues and has received maximum PAC support.

**TED STEVENS (R-AK)** - The only tough challenge Stevens should face next year will not be in Alaska, but here in Washington. Assuming the Republicans maintain control of the Senate (a fairly safe bet at this time), Stevens, the Majority Whip, has made it clear that he is interested in succeeding retiring Senate Majority Leader Baker. While Bob Dole of Kansas is an early favorite for this top slot, Dick Lugar of Indiana and Pete Domenici of New Mexico have also shown interest. Nevertheless, Stevens' slot on the Defense Appropriations Subcommittee and his current Whip's role make him an increasingly more important player in future Senate action bearing on U.S. - Israel relations. While his past record is mixed, he has recently displayed a greater interest in the Middle East and could become of greater help in the future.

**\*DAVID PRYOR (D-AR)** - Should Republican Congressman Ed Bethune decide to challenge Pryor, some analysts would consider Pryor "potentially vulnerable," despite a recent statewide poll showing Pryor beating Bethune 68% to 29%. No Democratic primary is expected, and Pryor has raised nearly \$350,000 to date. Pryor's consistent record of support is in contrast to Bethune's marginal support on issues of concern to us.

**BILL ARMSTRONG (R-CO)** - With both of Armstrong's potential Democratic opponents, Governor Richard Lamm and Rep. Tim Wirth definitely taking themselves out of the race, Armstrong's political fortunes have improved considerably. Nevertheless, Lt. Governor Nancy Dick, the only announced Democratic candidate, claims to be within striking distance of Armstrong -- according to a poll she has not yet released. However, her perceived weakness as a challenger to Armstrong has sparked interest among other individuals. Should Dick avoid a tough primary, this could prove to be an interesting race against an incumbent with only a fair, at best, record of support on issues of concern to us. The PAC has made a modest contribution to Dick.

**\*JOE BIDEN (D-DE)** - Governor Pete DuPont's decision not to challenge the popular and articulate Biden in next year's election, makes Biden, a Foreign Relations Committee activist, virtually safe to

\*indicates PAC support

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Herbert Tenzer  
Roger Tilles  
Tex Weiner  
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Harold Ziskin

Representative Jack Kemp's Administrative Assistant said he is considering challenging Bentley for the Republican nomination. Either candidate would present Long with formidable opposition in a marginal District. Given the challenge issued by the Arab lobby, it is a race we cannot afford to lose. The PAC has contributed its maximum to Long.

#### OTHERS

As of today, Israel's other principal supporters in the House on the key Foreign Affairs and Appropriations Committees appear to be in fairly good shape for next year's elections. One possible exception is black Representative Bill Gray of the Foreign Operations Subcommittee. Gray, who has been a solid supporter, may face a tough primary challenge next spring.

Dante Fascell, who will become the next Chairman of the House Foreign Affairs Committee following the recent death of Clement Zablocki, should be in good political shape after a tough challenge last year. In addition, two veteran Committee colleagues, Democrat Howard Wolpe and Republican Ben Gilman who might still have difficult races, should be able to beat back strong challengers. Similarly, Democrat Matt McHugh and Republican Bill Green of the Appropriations Committee have consistently run close -- but victorious -- races in their marginal districts, and should be able to repeat their performance again next year. However, particularly where long-time friends are involved, the PAC has already contributed to the above-mentioned, as well as more than sixty other House of Representative supporters.

\* \* \* \* \*

#### PRESIDENTIAL POLITICAL NOTES - Morrie Amitay

Since our last analyses of the Presidential contenders, two new Democratic candidates have officially launched their campaigns, Rev. Jesse Jackson, and former 1972 Presidential candidate George McGovern. What characterizes the candidacies of these two, other than the long odds on their success, is the clear departure from the other candidates on their positions regarding Israel and the Middle East.

#### JACKSON

Jackson's expressed purpose in seeking the Presidency is to create -- "leverage" to allow black involvement in a range of issues, including foreign policy. And as Rep. Mickey Leland has stated, "blacks are not just talking about foreign policy in regard to Africa and the Caribbean!" Jackson's dubious actions and pronouncements on the Middle East are at variance with the Democratic Party's traditional support for close U.S. - Israel ties, and offensive to the Party's significant Jewish constituency.

Jackson, the Director of the Chicago-based operation PUSH, has made his mark on Middle East politics with his outspoken support for, and his public embracing of PLO Chief Yassir Arafat. After embarking upon a "fact-finding" mission to the Middle East in 1979, Jackson declared that "one who does not regard Arafat as a true hero does not read the situation

correctly." He also called U.S. refusal to recognize the PLO an "international absurdity," and announced his support for the creation of a Palestinian state, claiming that a pro-Israel attitude endangered America's "vital interests." Recently, Jackson has moved from claiming there is "a misperception," of his Mideast positions, to saying "increased strategic cooperation with Israel is vital to our national interest." It is reasonable to assume that the reality of fundraising from Democratic Party sources prompted this positive declaration rather than a genuine change of heart.

#### McGOVERN

When George McGovern announced his surprising candidacy for President, he pledged to say nothing about any issue except what he honestly believed. In doing so with regard to Israel, he has followed the same critical line which has characterized his actions of the past few years. With a George Ball-like attitude of "saving Israel despite itself," McGovern "deplored" the "totally unjustified" Israeli invasion of Lebanon and denounced its settlements policy on the West Bank. He has described former Israeli Prime Minister Begin a "reactionary militarist . . . and a disgrace both to Judaism and the Israeli nation," and has termed efforts by American citizens to promote strong U.S. - Israeli relations as constituting "bullying tactics" and "McCarthyism." Hiding behind his perception of the attitude of some American Jewish "doves" and citing Chancellor Bruno Kreisky, McGovern is demonstrating the same lack of understanding of American Jewish concerns he exhibited as a former member of the Senate Foreign Relations Committee. In an October campaign speech before Maine Democrats, McGovern denounced the national Democratic Party's pro-Israel Lebanon resolution at its 1982 Midterm Convention, and insisted that a "debunking" of Israel would have been more appropriate.

While one might concede that McGovern means well, Israel's supporters can console themselves in the knowledge that his chances of winning the nomination, much less the Presidency, are just about nil. In fact, many believe that if McGovern were to run against Richard Nixon today, the result would be the same as before!

#### WASHINGTON POLITICAL ACTION COMMITTEE

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## WASHINGTON PAC CONTRIBUTIONS

ELECTION DAY NOVEMBER 2, 1982 - APRIL 1, 1984

SENATE

| <u>CANDIDATE</u>     | <u>CHECK DATE</u> | <u>PURPOSE</u>     | <u>AMOUNT</u> |
|----------------------|-------------------|--------------------|---------------|
| Max Baucus (D)       | 11/24/82          | Dinner Event       | \$ 150        |
| "                    | 12/09/82          |                    | 300           |
| "                    | 05/02/83          | PAC Luncheon       | 2000          |
| "                    | 06/30/83          |                    | 1000          |
| Joe Biden (D)        | 10/02/83          | NY Event           | 1550          |
| Jeff Bingaman        | 02/28/84          |                    | 1500          |
| "                    | 01/28/83          | 1982 Debt. Retire. | 1000          |
| "                    | 09/12/83          |                    | 500           |
| Rudy Boschwitz (R)   | 04/13/83          | event              | 500           |
| "                    | 11/21/83          |                    | 2000          |
| "                    | 5/21/84           |                    | 1000          |
| Bill Bradley (D)     | 11/09/82          | Dinner event       | 1000          |
| "                    | 04/09/83          |                    | 1000          |
| "                    | 05/05/83          |                    | 2000          |
| "                    | 06/21/83          |                    | 1000          |
| Tom Corcoran (R)     | 01/20/83          | PAC Luncheon       | 500           |
| "                    | 04/08/83          |                    | 1000          |
| "                    | 06/15/83          |                    | 2000          |
| "                    | 10/02/83          |                    | 500           |
| "                    | 01/25/84          |                    | 1000          |
| Alfonse D'Amato (R)  | 05/16/83          | 1986               | 1000          |
| Norm D'Amours (D)    | 04/13/83          | (House)            | 300           |
| "                    | 02/01/84          | PAC Luncheon       | 2500          |
| "                    | 03/30/84          |                    | 2500          |
| Nancy Dick (D)       | 08/31/83          |                    | 1000          |
| Chris Dodd (D)       | 05/24/83          | 1986               | 1000          |
| Bob Dole (R)         | 4/24/84           | 1987               | 2,000         |
| Dave Durenberger (R) | 02/07/84          | 1988               | 250           |

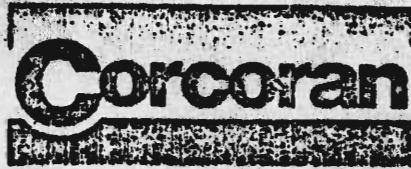
| CANDIDATE                 | CHECK DATE | PURPOSE      | AMOUNT       |
|---------------------------|------------|--------------|--------------|
| Al Gore (D)               | 05/27/83   |              | \$ 500       |
| "                         | 06/28/83   | PAC Luncheon | 2000         |
| "                         | 01/05/84   |              | 500          |
| "                         | 02/27/84   | event        | 2000         |
|                           |            |              | \$5000 PRIME |
| Tom Harkin (D)            | 06/27/83   |              | 2000         |
| "                         | 09/17/83   | PAC Luncheon | 2000         |
| "                         | 02/28/84   |              | 1000         |
| "                         | 03/30/84   |              | 1000         |
| Paula Hawkins (R)         | 05/16/83   | 1986         | 1000         |
|                           |            |              | \$5000 PRIME |
| Howell Heflin (D)         | 04/26/83   | event        | 1000         |
| "                         | 5/19/83    | PAC Luncheon | 4000         |
|                           |            |              | \$500        |
| Jim Hunt (D)              | 10/10/83   |              | 2000         |
| "                         | 11/18/83   |              | 1000         |
| "                         | 02/16/84   |              | 2000         |
|                           |            |              | \$500 PRIME  |
| Sen. Bob Kasten (R)       | 09/15/83   |              | 500          |
| Sen. Edward Kennedy (D)   | 5/19/83    | event        | 1000         |
| "                         | 3/30/84    | FR 1988      | 1000         |
| Sen. Frank Lautenberg (D) | 03/15/83   | 1983 debt    | 500          |
| "                         | 03/30/84   |              | 1000         |
| Sen. Carl Levin (D)       | 05/12/83   |              | 500          |
| "                         | 06/15/83   |              | 2000         |
| "                         | 09/19/83   |              | 2500         |
|                           |            |              | \$500 PRIME  |
| Sen. Sam Nunn (D)         | 04/13/83   | event        | 1000         |
| Sen Bob Packwood (R)      | 07/14/83   | 1986         | 1000         |
| Sen. Claiborne Pell (D)   | 10/17/83   | event        | 1000         |
| " " " " " "               | 4/19/84    |              | 2000         |

CANDIDATECHECK DATEPURPOSEEXHIBIT EPAGE 3AMOUNT

|                        |  |                                      |                              |
|------------------------|--|--------------------------------------|------------------------------|
| en. Larry Pressler (R) | 07/01/83<br>10/31/83                         | PAC Luncheon                         | \$1000<br>1000               |
| en. David Pryor (D)    | 07/28/83                                     | PAC Luncheon                         | 2000                         |
| ay Rockefeller (D)     | 11/21/83                                     | 12/14 Event                          | 1000                         |
| en. Jim Sasser (D)     | 12/09/82<br>04/13/83                         | 1982 Debt.                           | 500<br>500                   |
| aul Simon (D)          | 05/11/83<br>01/19/84<br>02/06/84<br>03/05/84 | House<br>NY Event<br>NY Event        | 1250<br>1500<br>2500<br>1000 |
| en. Arlen Specter (R)  | 07/14/83                                     | 1982 Debt.                           | 1000                         |
| en. Alan Simpson (R)   | 02/22/83<br>01/10/84                         | event                                | 500<br>500                   |
| William Winter (D)     | 03/01/84<br>04/05/84                         |                                      | 2000<br>1000                 |
| <u>HOUSE</u>           |  |                                      |                              |
| ep. Joe Addabbo (D)    | 05/11/83<br>10/05/83                         | event                                | 300<br>200                   |
| ep. Gary Ackerman (D)  | 05/27/83                                     | event                                | 500                          |
| yn Adelman             | 12/12/83<br>01/20/84                         | special election<br>special election | 500<br>500                   |
| ep. Frank Annunzio (D) | 1/31/84                                      |                                      | 250                          |
| ep. Les Aspin (D)      | 04/13/83<br>11/02/83                         |                                      | 250<br>250                   |
|                        | 5/1/84                                       | enuf                                 | 500                          |

5,000

KT- Fin-  
Pacy



Corcoran for Senate Exploratory Committee  
P.O. Box 2667 • Aurora, Illinois 60507

February 9, 1983

Mr. Morris J. Amitay  
Washington Political Action Committee  
400 North Capitol Street, N.W.  
Washington, D.C. 20001

Dear Morris,

Many thanks for your words of encouragement regarding the Senate possibility, and for the generous check you enclosed from the Washington PAC. I can assure you that your contribution is greatly appreciated and will be carefully spent.

I'll be keeping in touch with you in the coming months.  
With my best personal regards, I am

Sincerely,

A handwritten signature of Tom Corcoran, written in dark ink, enclosed within a circular outline.

Tom Corcoran  
Representative in Congress

TC/jp

EXHIBIT "K"

35040511418

WASHINGTON POLITICAL ACTION COMMITTEE

400 NORTH CAPITOL STREET, N.W.

SUITE 100

WASHINGTON, D.C. 20001

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(202) 847-6610

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JOSEPH WOLFE

April 7, 1983

Hon. Tom Corcoran  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Tom:

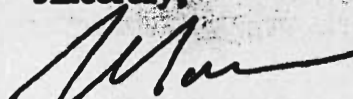
It was good of you to come to our luncheon yesterday and the group was impressed by your articulation and candor.

As I promised, I am enclosing our PAC's additional check for \$1000 along with our best wishes for your success.

I will be calling for an appointment to see you next week to discuss a number of matters.

With best wishes,

Sincerely,

  
Morris J. Amitay

MJA/pb

Enclosure

MORRIS J. AMITAY, TREASURER  
WASHINGTON POLITICAL ACTION COMMITTEE  
400 NORTH CAPITOL STREET, N.W., SUITE 100  
WASHINGTON, D.C. 20001

1340

PAY TO THE  
ORDER OF

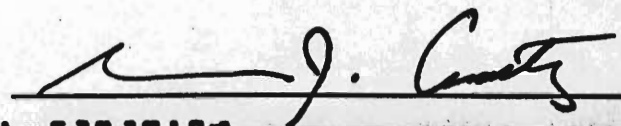
Corcoran Exploratory Committee

\$ 1,000<sup>00/100</sup>

One Thousand <sup>00</sup>/<sub>100</sub>

DOLLARS

NS&T BANK, N.A.  
WASHINGTON, D. C. 20005



STATEMENT OF JERRY BENJAMIN

1. My name is Jerry Benjamin. My address is A.B. Data, Ltd., 8050 North Port Washington Road, Milwaukee, Wisconsin 53217.
2. This response was originally due on May 22, 1984. An extension of time until June 6, 1984, was obtained.
3. I have been with A.B. Data, Ltd. for three years and am currently its President.
4. A.B. Data provides a range of direct mail consulting and services. For some constituencies, A.B. Data's lists are by far the best available. On occasion, the services of A.B. Data have been utilized in a primary by candidates for nomination by both parties.
5. I have known Michael Goland for some time, pre-dating his decision to use the services of A.B. Data. He contacted me concerning proposed mailings in opposition to the reelection of Senator Charles Percy. The mailings were written by Mr. Goland. The only involvement of A.B. Data was to provide a mailing list and mailing services. There was no coordination of Mr. Goland's expenditures with any candidate's campaign by A.B. Data.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.

  
Jerry Benjamin

Executed on June 4, 1984.

TO: Our subscribers

April 23, 1984

FROM: Alan Baron

No. 202

**PRESIDENTIAL POLITICS: LEADERSHIP**

Leadership is not, as sometimes suggested, motivating people to sacrifice their self-interest for the public interest. Rather, it is motivating them to sacrifice short-term self-interest (instant gratification) for their longer-term (enlightened) self-interest, likely to be consistent with the public interest.

Leadership and political campaigns do not go well together, since candidates' schedules move them from one instant gratification group to another. The failure of a candidate to exert leadership is as predictable as the failure of an individual to remain on a strict diet while walking in and out of bakeries all day long.

But, this year, the lack of leadership seems even more pervasive than usual. President Reagan, fearful of the National Rifle Association, even refuses to support a ban on bullets manufactured to pierce bullet proof vests. And he opened his campaign with self-righteous statements on school prayer to New Right religious groups, attacking the character of his opposition, something he has seldom engaged in in recent years.

Pandering hit a high when Mondale and Hart promised NY Jews they would move our embassy in Israel from Tel Aviv to Jerusalem. That would have no direct impact on Israel's economic and military security and its long-term impact would, ironically, be negative. It would be a gratuitous slap-in-the-face to Moslem states (including non-Arab ones like Pakistan) and moderate Arab leaders (who've advocated keeping communications open with the United States) - reducing America's minimal remaining credibility in prodding Arabs to negotiate. A side effect would escalate terrorist attacks on Jewish holy sites. Hart did hesitate a moment before yielding. ("It's just one croissant, Gary. you can go back on your diet in the morning," friends said, so to speak.) Mondale wasn't on a diet in the first place, which is why he campaigns with so much excess weight.

Last week, Reagan showed some restraint: he refused to promise Homebuilders he would never advocate altering the most sacrosanct section of the tax code: home mortgage interest deductions. (The last candidate to say that was Jimmy Carter in 1976, who reversed himself almost immediately.) Assuming Reagan's reelected, he'll no doubt disguise his 1985 tax increase as "tax simplification" - and the idea is, to be sure, very "hot" now - on the left (Sen. Bradley, D-NJ), center (Sen. DeConcini, D-AZ) and right (Rep. Kemp, R-NY). Still, President Reagan is not likely to advocate closing the mortgage loophole and Congress, which has recently been adding more loopholes, is even less likely to approve.

Nevertheless, Reagan deserves points for his modest "profile in courage," especially considering his competitors. The Israel embassy issue is the clearest example of their lack of leadership, but their failure to lead was even more clearly demonstrated by their reactions to defeat.

Political/media consultant Bob Squier says the low point of a campaign is when the candidate starts blaming the voters. Most Presidential candidates are beyond that, but not Mondale and Hart. After New Hampshire, Mondale attacked "yuppies" (young, urban professionals) for being taken in by "tinsel" and being selfish (fiscally moderate). After Pennsylvania, Hart blamed his defeat on voters afraid of change. The real fault rested with the candidates, who failed to lead.

35040511421

**PRESIDENTIAL POLITICS: ELECTABILITY**

Despite Walter Mondale's momentum, polls continue to show Gary Hart running stronger against Ronald Reagan. The latest, Harris, puts Reagan 1% ahead of Hart (47-46%) and 16% ahead of Mondale (55-39%).

Why the disparity?

To be sure, it partly reflects Hart's appeal to swing voters, particularly those attracted to candidacies like John Anderson's. The very characteristics of the Coloradoan which make hardcore Democrats uneasy - independence, fiscal moderation, coolness, etc. - are precisely those that make it easier for such voters to support him than Mondale.

But there is a far more fundamental reason. As BR Associate Editor Bill Schneider observes, there are two basic kinds of elections: referendums on incumbents and choices between contrasting alternatives. Of course, most elections include elements of each: 1980 was first a negative referendum on Carter, but Reagan could not have won had he not convinced the public he was an acceptable choice, providing no major risk of making things worse (e.g., starting WW III, stopping Social Security) and some hope for making things better (e.g. Reaganomics).

A Reagan/Hart battle would be like 1980: primarily a referendum on the incumbent. And Reagan's failure to decisively defeat opponents in matchups of this nature has been clear in polls throughout his term.

A Reagan/Mondale battle is now perceived as a choice between policies of the past (New Deal liberalism, the Carter Administration) and present. And the public's choice has also been clear throughout RR's term, which is why pollster Dick Wirthlin and other WH strategists have long preferred facing Mondale.

How meaningful are the current polls?

As indicated below, history is in their favor. But things could change:

- (1) Continuing losses by Hart would reduce his strength against Reagan.
- (2) The referendum could turn decisively negative to Reagan, whose vulnerability on Central America and interest rates is increasing.
- (3) Mondale's identification with past Democratic policies could fade, when/ if he wins the nomination and focuses his campaign on November. However, Reagan will be expert in framing the issue as New Deal vs. New Ideas. After all, as one GOP strategist puts it, he's been "using that script since 1966."

And even if Mondale has an opportunity to refocus the campaign, there's little indication he will: his primary campaign indicates his priority is just the opposite: to rebuild the old New Deal Coalition and convince Americans they were wrong in 1980 and interest group liberalism is right for the future.

It is an article of faith among politicians that people "outside the beltway" (Washington) could care less about electability. Republicans cite Nelson Rockefeller and Democrats, Edmund Muskie, as examples of candidates seeking the nominations on such grounds, to no avail. This year, that seems to have changed a bit. Ironically, there's been a role reversal; in Washington, some politicians and interest group leaders now see the campaign as a moral confrontation and Hart as downright evil. With their institutional credibility perceived to be at stake, many privately prefer Reagan to Hart. On the other hand, Hart voters increasingly mention electability as a major reason.

Why is this year different from all other years among these voters?

- (1) Seldom before has the difference between the candidates' general election strength been of this magnitude.
- (2) Never before has there been so much coverage of Exit Polls.
- (3) There are few deep issue or ideological differences. (Institutional credibility is irrelevant "outside the beltway.")
- (4) The Democrats are mainly motivated by restoring the pre-Reagan status quo, not a program of change.

**Historical Note:** In the last three decades, all five Presidents elected

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after contested battles for the nomination had done better than their nomination opponents in Gallup's final pre-convention comparisons of "trial heats."

1952: Eisenhower led Kefauver by 20%; Taft trailed Kefauver by 9%. (Kefauver was the choice of 45% of Democrats polled, to 12% for Stevenson, who was drafted at the convention and not included in the "trial heats.")

1960: Kennedy ran only 2% behind Nixon, but Nixon lead Johnson and Stevenson by 12% and Symington by 14%.

1968: Nixon did better than Rockefeller against Humphrey and McCarthy. Although his margin was minimal (2-4%), and other polls produced other results, Gallup deflected the anti-Nixon electability argument.

1976: Carter consistently beat Ford by more than any other Democrat.

1980: In the last comparison, RR ran 25% behind Carter, but Carter beat Bush by 29%.

In other nomination battles, there were major differences twice. In 1964, Goldwater trailed Johnson by 59%; Scranton trailed by "only" 43%. In 1968, Humphrey trailed Nixon by 16%; McCarthy trailed Nixon by 5%. In both cases, the party nominated the weaker contenders, and lost.

### PRESIDENTIAL POLITICS: PRIORITIES

Americans would like their Presidents to possess FDR's strength, Truman's candor, Ike's statesmanship, JFK's wit, LBJ's shrewdness, Nixon's knowledge of world affairs, Ford's warmth, Carter's independence and Reagan's ability to communicate. But those qualities are, often, mutually exclusive, so priorities must be set.

In 1976 and 1980, Gallup measured various qualities of the candidates as perceived by the public. The following figures indicate the percentage of the public crediting each quality to each candidate in each year:

| Area:  | Carter |      | Ford Reagan |      | Carter Margin |      | CHANGE |
|--|--------|------|-------------|------|---------------|------|--------|
|  | 1976   | 1980 | 1976        | 1980 | 1976          | 1980 |        |
| <b>CHARACTER/QUALIFICATIONS</b>                  |        |      |             |      |               |      |        |
| Religious  | 72%    | 87%  | 40%         | 40%  | +32%          | +47% | +15%   |
| High Moral Principles                            | 68     | 83   | 64          | 70   | + 4           | +13  | + 9    |
| Says What Believes if Unpopular                  | 48     | 57   | 44          | 54   | + 4           | + 3  | - 1    |
| Bright, Intelligent                              | 72     | 73   | 58          | 73   | +14           | 0    | -14    |
| Good Judgment in Crisis                          | 55     | 58   | 55          | 58   | 0             | 0    | 0      |
| Clearly Understands Issues                       | 44     | 50   | 50          | 55   | - 6           | - 5  | + 1    |
| Sides with Average Citizen                       | 44     | 56   | 24          | 43   | +20           | +13  | - 7    |
| Sympathetic to Poor                              | 64     | 68   | 26          | 41   | +38           | +27  | -11    |
| <b>IDEOLOGY</b>                                  |        |      |             |      |               |      |        |
| Moderate/Middle-of-the-Road                      | 42     | 82   | 52          | 48   | -10           | +34  | +44    |
| <b>LEADERSHIP APPROACH</b>                       |        |      |             |      |               |      |        |
| Colorful, Interesting                            | 64     | 50   | 36          | 70   | +28           | -20  | -48    |
| Decisive, Sure of Himself                        | 56     | 37   | 50          | 69   | + 6           | -32  | -38    |
| Strong   | 48     | 31   | 36          | 65   | +12           | -34  | -46    |
| <b>THEMATIC APPROACH</b>                         |        |      |             |      |               |      |        |
| Modern, up to Date Solutions                     | 54     | 39   | 42          | 51   | +12           | -12  | -24    |
| Imaginative, Innovative Solutions                | 44     | 37   | 30          | 52   | +14           | -15  | -29    |
| Well Defined Program for Moving<br>Country Ahead | 40     | 27   | 34          | 53   | + 6           | -26  | -32    |

These comparisons indicate that Democratic problems in 1980 were far more fundamental than personal antipathy for Carter. Carter led RR in every aspect in the personal category but one, although Reagan did do better than Ford. Observations:

1. The failure of Carter's ideological edge to prove decisive did not reflect

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an ideological shift. Polls showed people put themselves and Carter near the Center; Reagan far to the Right. Reagan overcame this by (a) emphasizing his pragmatic Gubernatorial record; (b) selling his positions with non-ideological arguments; (c) providing alternatives to government action (tax incentives, free enterprise zones, etc.); and (d) displaying independence from the New Right (excluding activists from key campaign positions, naming George Bush, etc.). Success still would not have been possible had not moderate/middle-of-the-road/establishment policies and Presidents (Johnson, Nixon, Ford, Carter) been discredited and the public's willingness to look to other options increased.

2. The key change from 1976 to 1980 was Carter's inability to provide the kind of Presidency - in terms of leadership and thematic approaches - Americans seek. He failed to define clear policy priorities and decisively fight for their implementation. That failure resulted from (a) Carter's technocratic, problem-solving approach to government and lack of priorities and/or any ideological/philosophical framework; and (b) the Democrats' lack of coherent priorities and programs for change, and the unwillingness of coalition interest groups to sacrifice instant gratification goals for common ones.

### PRESIDENTIAL POLITICS: OTHER OBSERVATIONS

Surprises As the Gallup surveys from 1976 and 1980 on the previous page indicate, Walter Mondale should not have been surprised about the impact of Hart's New Ideas theme.

A review of 1980 election returns from Colorado indicates that Hart should not have been surprised by his poor showing among blue collar Democrats. In comparison to the Democratic candidate for the Board of Regents (the only other statewide office on the ballot), Hart ran strongest (12-18% ahead of his fellow Democrat) in the fast growing business and professional suburbs surrounding Denver (e.g. Boulder, Arapahoe, Jefferson and Douglas counties) and high tech boom towns (e.g. Fort Collins). Hart ran less well (about 8% ahead) in blue-collar places like Pueblo and Adams county near Denver. And he only ran about even with the Regents candidate in the southern Colorado mining counties with severe economic problems.

Indicators In BR197 (1/30/84), the critical swing voters in this year's election were identified by Associate Editor Bill Schneider according to their response to a question on the economy with three options for answers. Non-swing voters included the 24% who saw no real recovery and favored Mondale over RR, 73-19%, as well as the 30% who expected a longterm recovery and backed RR, 78-17%. The swing voters, 42%, saw the recovery as only temporary, and were closely divided, with Mondale ahead, 52-41%. Since that survey, the LATimes poll indicates that the "no recovery" group has fallen to 22%. But in New York and Pennsylvania, among primary voters, it was about 50% - regrettably not only for those states' workers, but also for Gary Hart.

Pragmatism As long as he's a serious candidate, Gary Hart is certain to sweep Colorado. And unless he's elected President, he's certain to stay in the Senate for nearly three more years. Thus, the Colorado Education Association has endorsed Hart, and the National Education Association has not objected. The Colorado AFL-CIO, as a division of the national, has no such option. It could, however, play a similar game by taking it easy, and many unions are doing that. The state federation is not, and is expected to spend over \$75,000 for Mondale. No one can accuse them of hypocrisy - or pragmatism.

NOTE: BR 196 identified Glenn Dawson as a member of William Dawson's family; he is (to those who know him, obviously) not. Morris Amitay, ex-Director of the American Israeli Public Affairs Committee, says he did not engage in "raising funds and advising" Rep. Corcoran, but acknowledges signing PAC checks to Corcoran and conducting an interview on Israel, distributed by the campaign.



ATTORNEY AT LAW  
MORRIS J. AMTAY, P.C.  
400 NORTH CAPITOL STREET, N.W.  
SUITE 100  
WASHINGTON, D.C. 20001  
(202) 347-6613

6-8-83

Mike: - I checked after your call.

Re a direct mail house  
for your Percy mailing - A.B.  
Data (Benjamin) is only one  
with best lists and experience.

They do almost all political direct  
mail to Jews. (e.g. Weicker)

Suggest they only do actual  
mailing to their lists to avoid  
any problems should they do  
anyone in Ill. Senate race.

See you,

Morri

35040511425



CORCORAN FOR SENATE COMMITTEE  
P. O. BOX 2867 • AURORA, ILLINOIS 60507

Steele, Charles

May 18, 1984

MAY 21 A10:25

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

Re: MUR 1684

Dear Mr. Steele:

This letter is written in response to your letter dated April 30, 1984 and the complaint filed by Senator Charles H. Percy ("Percy") and Citizens for Percy '84 ("Citizens") against, inter alia, the Corcoran for Senate Committee ("Committee"). 2 U.S.C. §437g(a). Percy and Citizens contend that the Committee violated the Federal Election Campaign Act of 1971, as amended, by cooperating and consulting with Michael Goland ("Goland") who made independent expenditures on behalf of the Committee. Percy and Citizens allege that Goland made the expenditures at the direction of Morris Amitay ("Amitay") who allegedly "was both an agent of and fundraiser for the Corcoran campaign" and "was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs." See Complaint at 2. Percy and Citizens acknowledge that their complaint is based upon their information and belief that such allegations are true and not upon documentary evidence or sworn statements. See Complaint at 1. Percy and Citizens also contend that the use of the same direct mail fundraising firm by Goland and the Committee mandates that Goland's expenditures are presumptively not independent.

- I. Morris Amitay and Michael Goland were not agents or authorized fundraisers of the Committee.

In its regulations at 11 C.F.R. § 109.1(a), the Federal Election Commission ("FEC") defines independent expenditure as:

Mr. Steele  
May 18, 1984  
Page Two

an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.

Percy and Citizens contend that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay. The FEC defines agent at 11 C.F.R. §109.1(b)(5) as:

any person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures.

Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or the candidate, Thomas Corcoran. See Affidavit of Reed J. Wilson ("Wilson Affidavit") at 4. Amitay did not hold any position within the campaign organization. See Wilson Affidavit at 5. Likewise, Goland was not authorized to make expenditures on behalf of the campaign nor did he hold any position within the campaign organization. See Wilson Affidavit at 4-5.

Percy and Citizens further contend that Goland's independent expenditures were "made with the cooperation or with prior consent of, or in consultation with, or at the request of, a candidate or any agent or authorized committee of the candidate" because such expenditures were made through Amitay who was authorized to raise funds for the Committee. See 11 C.F.R. §§ 109.1(a)(4) and 109.1(a)(4)(i)(B). An expenditure is presumed to be made at the direction of the candidate if it is made through an authorized fundraiser. See 11 C.F.R. § 109.1(a)(4)(i)(B). Amitay was never authorized by the Committee to raise funds on its behalf. See Wilson Affidavit at 6. Likewise, Goland was not authorized to raise funds for the Committee. See Wilson Affidavit at 6.

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Mr. Steele  
May 18, 1984  
Page Three

The Committee did not cooperate or consult with Goland nor did it participate in the making of Goland's independent expenditures. See Wilson Affidavit at 7. Also, neither Goland nor Amitay were agents or authorized fundraisers of the Committee. See Wilson Affidavit at 7. The Committee had no involvement in Goland's expenditures and asks the FEC to take no further action against it.

II. The Committee was not aware that Goland used the same direct mail consultant.

Percy and Citizens contend that the use of the same direct mail consultant, AB Data, Ltd. ("AB Data"), by Goland and the Committee gives rise to a presumption that Goland's expenditures were not independent. The Committee was not aware that Goland used the same direct mail consultant. See Wilson Affidavit at 9. As a result of the above-mentioned relationship of the Committee with AB Data and its lack of knowledge that Goland used the same firm, the FEC could not sustain a finding of coordination between Goland and the Committee through AB Data, see MUR 1252/1299, General Counsel's Brief at 39, and, therefore, the Committee asks the FEC to take no further action against it.

III. Conclusion

The Committee respectfully asks the FEC to find that no further action should be taken against the Committee on the basis of the complaint. The Committee's sworn testimony refutes the allegations based on information and belief of Percy and Citizens.

Respectfully submitted,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

35040511428

BEFORE THE FEDERAL ELECTION  
COMMISSION OF THE UNITED STATES  
OF AMERICA

IN THE MATTER  
OF CORCORAN FOR  
SENATE COMMITTEE et al.

MUR 1684

AFFIDAVIT

COUNTY OF LASALLE  
STATE OF ILLINOIS

)  
) ss:  
)

Reed J. Wilson for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I was the campaign manager for Thomas J. Corcoran and his principal campaign committee, the Corcoran for Senate Committee ("Committee"), in Mr. Corcoran's campaign for the Republican nomination for the office of United States Senator from the State of Illinois.
3. I directed and supervised all aspects of the campaign and was aware of Mr. Corcoran's and the Committee's relationship with campaign employees, agents, fundraisers and consultants.
4. Neither Morris Amitay ("Amitay") nor Michael Goland ("Goland") had oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or Mr. Corcoran.

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5. Neither Amitay nor Goland held any position with the Corcoran campaign organization.

6. Neither Amitay nor Goland were authorized to raise funds for the Committee.

7. Neither Mr. Corcoran, the Committee nor any employees or agents of the Committee cooperated or consulted with Goland in the making of expenditures on behalf of the Committee.

8. AB Data, Ltd. ("AB Data") was retained by the Committee in January, 1983 to perform direct and voter contact mail services. These services included the obtaining of direct mail lists, the creation of fundraising copy and packages, the maintenance of contributor files, the production and mailing of fundraising packages, and the creation and production of voter contact mail to Republican households in selected counties within the state. The Committee did not ask AB Data to provide any services or consultation to the campaign beyond those listed above.

9. The Committee did not know until after the completion and mailing of the Goland direct mail program that Goland also used AB Data as a direct mail consultant.

Reed J. Wilson  
Reed J. Wilson

Subscribed and sworn to before me this 18th day of May, 1984.

Sharon DeCoursey  
Sharon DeCoursey

35040511430

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

34 JUN 15 P5: 16

MUR # 1684  
Date Received 4/26/84  
Date of Notification 4/30/84  
Staff Duane A. Brown

COMPLAINANTS' NAMES: Senator Charles H. Percy  
Citizens for Percy '84  
RESPONDENTS' NAMES: Corcoran for Senate Committee  
William F. Keck, as treasurer  
Morris Amitay  
Michael Goland  
RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A), 2 U.S.C. § 441a(f)  
11 C.F.R. § 109.1(a), 11 C.F.R. § 109.1(b)(1)(A)  
INTERNAL REPORTS CHECKED: Complainant/Respondent, MUR 1424  
MUR 1252  
FACTUAL AGENCIES CHECKED: None

**SUMMARY OF ALLEGATIONS**

Daniel Swillinger, Esq., has filed a complaint on behalf of Senator Charles H. Percy and the Citizen for Percy '84 Committee ("the '84 Committee") (Attachment I). The '84 Committee alleges that a Michael Goland financed a direct mail campaign against Senator Percy prior to the March 20, 1984 Illinois Republican primary. The complaint states that Mr. Goland made \$278,729 in expenditures against the Percy campaign. In addition, the '84 Committee states that Mr. Goland reported these expenditures as being independent. However, the '84 Committee's complaint attempts to demonstrate that the Goland expenditures were not independent, but were made with the cooperation and prior consent of the campaign of Representative Thomas Corcoran, Senator Percy's principal primary opponent. If this is so, the expenditures would constitute excessive contributions made by Goland and accepted by the '84 Committee in violation of

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2 U.S.C. §§ 441a and 441a(f).

**FACTUAL AND LEGAL ANALYSIS**

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The '84 Committee argues that Mr. Goland made his expenditures at the direction of a Morris Amitay, an individual claimed by the '84 Committee to be an agent and fundraiser for the Corcoran campaign. The '84 Committee argues that because of his alleged position with the Corcoran campaign, Mr. Amitay was aware of the Campaign's plans, project and needs. As such, the Committee argues that Mr. Goland's expenditures were made with the awareness of the campaign's plans, project and needs and were not independent. The '84 Committee attempts to illustrate the relationship between the Corcoran Committee and Mr. Amitay by providing two news articles which indicate that Mr. Amitay is, "raising funds for and advising Corcoran". Further, the '84 Committee indicates that the relationship between Mr. Amitay and Mr. Goland is "well documented" since Mr. Goland is a Board member of Washington PAC and Mr. Amitay is the PAC's treasurer. Finally, in another attempt to show the close relationship of Messrs. Amitay and Goland, the '84 Committee submitted what appears to be a note to an individual named "Kim" from an individual named Morris (assuming its Morris Amitay) on Washington PAC letterhead. The note signed by "Morris" states in part that "no one makes a move without my o.k.". The '84 Committee seems to believe that this note is conclusive evidence that the note refers specifically to Mr. Goland and that Mr. Goland's expenditures are at Mr. Amitay's direction. In fact,



the '84 Committee argues that Mr. Goland made his expenditures at the direction of Morris Amitay whom the '84 Committee refers to as "an agent and fundraiser of the Corcoran campaign". To further illustrate the nature of the relationship, the '84 Committee provided newspaper articles and indicated that both Goland and Amitay served on the Board of Washington PAC. Neither the news articles nor the fact that Messrs. Goland and Amitay share Board membership in Washington PAC provide conclusive evidence of cooperation or coordination between Goland, Amitay and the Corcoran Committee. Moreover, the '84 Committee's statement that a note from a "Morris" to a "Kim" conclusively showed that Mr. Goland's expenditures were not made independently of the Corcoran campaign bears little or no legal significance since the note does not specifically refer to anyone nor is the subject matter of the note clear.

On the other hand, the fact that Mr. Goland and the Corcoran Committee used a common vendor to disseminate direct mail literature requires more research. The '84 Committee cites MUR 1424 as controlling. In that MUR the Commission took the position that when a campaign and a person making expenditures on behalf of that campaign use the same fundraising agent, the expenditures are presumptively not independent.

Finally, the '84 Committee asserts, but presents no evidence to buttress the fact, that Jerry Benjamin is a principal in AB

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Data or, if he is, continues to consult to the Corcoran campaign in that capacity or the capacity of an agent of the Corcoran campaign.

On May 23, 1984, counsel for Michael Goland requested an extension of time until June 6, 1984, to respond to the complaint since his client was said to be out of the country at the time. The request was granted and on June 6, the response was received at the Commission. The Goland response is extremely lengthy and requires a great deal of attention and analysis. Since the Goland response and the Corcoran response overlap on many issues, the Office of General Counsel will make the appropriate recommendation as to each respondent as soon as the analysis of the responses is completed.

Charles N. Steele  
General Counsel

June 15, 1984  
Date

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

Attachment  
Complaint (1)

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**MUR 1684**

**Morris Amitay**  
**Michael Goland**

## **I. BACKGROUND**

Daniel Swillinger, Esq., has filed a complaint on behalf of Senator Charles H. Percy and the Citizen for Percy '84 Committee ("the '84 Committee"). The '84 Committee alleges that a Michael Goland financed a direct mail campaign against Senator Percy prior to the March 20, 1984 Illinois Republican primary (Attachment I). The complaint states that Mr. Goland made \$278,729 in expenditures against the Percy campaign. In addition, the '84 Committee states that Mr. Goland reported these expenditures as being independent. However, the '84 Committee's complaint attempts to demonstrate that the Goland expenditures were not independent, but were made with the cooperation and prior consent of the campaign of Representative Thomas Corcoran, Senator Percy's principal primary opponent. If this is so, the expenditures would constitute excessive contributions made by Goland and accepted by the Corcoran Committee in violation of 2 U.S.C. §§ 441a(a) and 441a(f).

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The '84 Committee argues that Mr. Goland made his expenditures at the direction of a Morris Amitay, an individual claimed by the '84 Committee to be an agent and fundraiser for the Corcoran campaign. The '84 Committee argues that because of his alleged position with the Corcoran campaign, Mr. Amitay was aware of the campaign's plans, projects and needs. The Committee argues that because Mr. Goland's expenditures were made with the awareness of the campaign's plans, projects and needs they were not independent. The '84 Committee attempts to illustrate the relationship between the Corcoran Committee and Mr. Amitay by providing two news articles which indicate that Mr. Amitay is, "raising funds for and advising Corcoran". Further, the '84 Committee indicates that the relationship between Mr. Amitay and Mr. Goland is "well documented" since Mr. Goland is a Board member of Washington PAC and Mr. Amitay is the PAC's treasurer. Finally, in another attempt to show the close relationship of Messrs. Amitay and Goland, the '84 Committee submitted what appears to be a note to an individual named "Kim" from an individual named Morris (assuming its Morris Amitay) on Washington PAC letterhead. The note signed by "Morris" states in part that "no one makes a move without my o.k.". The '84 Committee seems to believe that this note provides evidence that Mr. Goland's expenditures are at Mr. Amitay's direction. The '84 Committee goes on to state that the note "conclusively shows that the expenditures by Mr. Goland have not been made independently of the Corcoran campaign."

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Lastly, the '84 Committee avers that Mr. Goland financed a 90,000 person mailing produced by AB Data, Ltd., a Milwaukee direct mail firm at a cost of \$27,639.60. The '84 Committee introduced information which shows that the Corcoran Committee also used AB Data, Ltd., for direct mail purposes. The '84 Committee concludes from this fact that Mr. Goland and the Corcoran Committee coordinated their direct mail efforts and states that the expenditures by both are presumptively not independent since both used the same fundraising agent. In addition, the '84 Committee asserts that the content of the Goland mailings was designed by a Corcoran direct mail consultant, but produces no evidence to verify this assertion. The '84 Committee also states that Jerry Benjamin, formerly a consultant to the Corcoran campaign, is a principal in AB Data. The '84 Committee concludes by citing 11 C.F.R. § 109.1(b)(4) and (5) and MUR 1424 as the basis for its argument that the expenditures were not independent.

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On May 21, 1984, William Keck, treasurer for the Corcoran Committee ("the Committee") filed a response to the complaint (Attachment II). On June 6, 1984, and after a request for an extension of time to respond, Michael Goland and Morris Amitay, through counsel, filed their response to the complaint (Attachment III).

## II. LEGAL ANALYSIS

11 C.F.R. § 109.1(a) defines an independent expenditure as:

[a]n expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.  
(emphasis added)

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In its response, the Committee argues that Morris Amitay ("Amitay") and Michael Goland ("Goland") were not agents or authorized fundraisers of the Committee. The '84 Committee contends that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay, yet, the Committee states that, "Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee...." Moreover, the Committee argues that Amitay, "did not hold any position within the campaign organization" and that Goland did not hold a position within the campaign nor was he authorized to make expenditures on its behalf. The Committee attaches an affidavit by a Reed Wilson in support of its position. Mr. Wilson was the campaign manager of the Committee. Essentially, Mr. Wilson's affidavit reiterates the Committee's response wherein Mr. Wilson swears that neither Goland nor Amitay had a position with the organization, neither individual was authorized to raise money on behalf of the Committee and that neither the Committee nor agents or employees of the Committee cooperated or consulted with

Goland. Finally, the Committee defends its use of AB Data, the same fundraising firm used by Michael Goland, by stating that the Committee did not know until after the Goland direct mail program that Goland also used AB Data. The Committee states that AB Data was retained for the purpose of performing direct mail services and that AB Data did not provide consultation services to the campaign.

Messrs Goland and Amitay indicate through counsel and in supporting affidavits, inter alia, that Amitay did not control Goland's expenditures, that Amitay was not an agent of the Corcoran campaign and that Goland made his expenditures "independent" of any direction from Amitay or any member of the Corcoran Committee. In fact, the response indicates that Mr. Goland decided to make independent expenditures against Senator Percy because he was dissatisfied with Senator Percy's actions as a Senator and as Chairman of the Senate Foreign Relations Committee. Additionally, the response indicates that Goland did not care who succeeded Percy so long as Percy was not re-elected.

The response indicates, too, that Amitay is an attorney, and, in that capacity has provided a varied range of services to Mr. Goland commencing in 1982. Amitay asserts, therefore, that his only relationship with Goland, is as attorney and client and that he had no control over expenditures made against Senator Percy by Goland. Goland was said to have sought advice from Amitay regarding the legal ramifications surrounding the

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making of independent expenditures.

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The '84 Committee, in another attempt to show the close relationship of Messrs Goland and Amitay, submitted what appears to be a note to an individual named "Kim" from an individual named "Morris" (assuming Morris Amitay) which states in part that "no one makes a move without my o.k." The '84 Committee argues that the note refers to Goland and that the note conclusively shows the Goland expenditures were at the direction of Amitay. In fact, the note's content does not refer to anyone specifically nor is the subject matter of the note clear. Amitay and Goland argue that the content of the note makes it clear that it was offered in jest, however, there appears to be no rational basis to conclude that what was said was said in jest or otherwise. They continue by asserting that the note had no connection with the Goland expenditures and argue that the note provides no evidence of control over Goland.

Mr. Amitay is the treasurer of an organization known as Washington PAC. Mr. Goland was formerly a board member of Washington PAC. In addition, Mr. Amitay is a columnist who frequently reports on various election contests. In an effort to secure contributions from Washington PAC, Rep. Corcoran was said to have contacted Amitay to arrange to speak at a regularly scheduled PAC luncheon. The meeting in fact did occur and Rep. Corcoran did speak at a PAC luncheon. Moreover, the Corcoran campaign received (5) contributions totalling \$5,000 from

Washington PAC. Prior to Rep. Corcoran's speaking at the luncheon, however, Amitay was said to have interviewed him in an effort to enable Amitay to better understand Rep. Corcoran's views on issues of concern to Washington PAC and Amitay's readers. Subsequently, portions of the interview and a photograph of both Amitay and Rep. Corcoran, taken at the time of the interview, were used in a fundraising letter by the Corcoran Committee. The '84 Committee buttresses these facts by providing a newspaper article from the Baron Report which states that Amitay "is raising funds for and advising Cocoran." However, in his affidavit, Amitay swears that the article was inaccurate and later retracted, yet, no evidence of the retraction was provided. Moreover, no information is provided by Amitay to show that he did not have prior knowledge of the fact that his picture and portions of his interview with Rep. Corcoran were being used in fundraising efforts on behalf of the Corcoran Committee.

Finally, the '84 Committee complains that Goland used the same direct mail organization as that of the Committee and argues that the common use of AB Data was clearly part of the coordination effort between Goland and the Corcoran Campaign. Also, the '84 Committee argues that Jerry Benjamin, a direct mail consultant, is a principal of AB Data and was a consultant to the Corcoran Campaign. In defense, counsel for Goland and Amitay argue primarily that AB Data is not a fundraising agent.

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In fact, this defense runs astray of the real question which the '84 Committee poses. The '84 Committee in its complaint cites 11 C.F.R. § 109.1(b)(4) and (5) and past enforcement matters (e.g. MUR 1424, Caputo, Funkelstein, NCPAC) as the bases for stating that Goland and the Committee coordinated their direct mail efforts, stating that the expenditures by both are presumptively not independent since both used the same fundraising agent. Counsel for Goland and Amitay appears to concentrate his argument on defining what a fundraising agent is and dealing in minor semantics versus concentrating on the primary question posed in MUR 1424. At no time does the '84 Committee allege that AB Data is a fundraising agent, but instead cites language found in MUR 1424 where a common vendor who happened also to be a fundraising agent was the central issue. On the other hand, MUR 1424 is distinguishable from this matter. In MUR 1424 a key political strategist within a fundraising organization was employed simultaneously by two organizations - both of whom expressly advocated the defeat of the same candidate. In that case, the expenditures by both campaigns, having used the same strategist, were deemed to be coordinated. In this matter, Goland argues that he alone provided the content for his mailings and received no assistance or consultation from any official of AB Data. Moreover, the Committee argues that it had no knowledge of the fact that Goland was also using AB Data.

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In fact, the '84 Committee produced no evidence other than the common use of AB Data to show that a common strategy existed or that a particular individual within AB Data was responsible for coordinating the efforts of both the Committee and Goland. Accordingly, it would appear that the Commission's position in MUR 1424 is not applicable to this MUR. The only common element found to exist lies in the allegation that Jerry Benjamin, who is President of AB Data, was also allegedly a former consultant with the Corcoran Campaign. No evidence was produced by the '84 Committee, however, to show a connection regarding the efforts of Benjamin on behalf of Goland and/or the Corcoran Campaign, as was the case in MUR 1424.

### III. CONCLUSION

Although much of the information provided by the '84 Committee is not substantiated, major concerns are raised as a result of the numerous common elements that exist in the allegations. First, Morris Amitay indicated he has counselled Michael Goland on the legality of independent expenditures and other legal issues. Morris Amitay has also personally met with Rep. Corcoran several times during the campaign, and, was responsible for Rep. Corcoran speaking at a luncheon before Washington PAC - an organization to which Amitay and Goland both presently or formerly belong. Moreover, the Corcoran campaign received five contributions totalling \$5,000 from Washington PAC.

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In addition, Morris Amitay was said to have interviewed Rep. Corcoran regarding issues of concern to Washington PAC and portions of the interview and a photograph of both Amitay and Corcoran taken at the time of the interview were later used in a fundraising letter by the Corcoran Committee. The '84 Committee argues that because of the personal relationship of Amitay and Corcoran, Amitay became aware of the Corcoran campaign's plans, projects and needs and that he communicated the same to Goland.

The common element that links Michael Goland to the Corcoran campaign is Morris Amitay. Mr. Amitay admittedly met on numerous occasions with both Goland and Corcoran. The extent of the relationships between Amitay and Corcoran and Amitay and Goland raise issues concerning the independence of Goland's expenditures that have not been fully discounted in the responses to the complaint. This Office, therefore, recommends that the Commission find reason to believe that Michael Goland made and the Corcoran Committee accepted excessive contributions and send the attached interrogatories under order concerning the relationships of the parties.

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**IV. RECOMMENDATIONS**

1. Find reason to believe the Corcoran for Senate Committee and William Keck, as Treasurer violated 2 U.S.C. § 441a(f);
2. Find reason to believe Michael Goland violated 2 U.S.C. § 441a(a) (1) (A);
3. Find no reason to believe Morris Amitay violated any provision within our Act;
4. Approve the attached letters, orders and interrogatories.

Charles N. Steele  
General Counsel

September 21, 1984  
Date

By:

Kenneth A. Gross  
Associate General Counsel

**ATTACHMENTS**

- I Complaint
- II Corcoran Committee Response
- III Goland/Amitay Response
- IV Letter to William Keck
- V Letter and order to Steven Nissen, Esq. for Morris Amitay
- VI Letter and Order to Steven Nissen, Esq. for Michael Goland
- VII Letter and Order to Representative Corcoran

35040511446

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Corcoran for Senate Committee )

William F. Keck, as treasurer )

Morris Amitay )

Michael Goland )

MUR 1684

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission Executive Session of October 2, 1984, do hereby certify that the Commission took the following actions in MUR 1684:

1. Decided by a vote of 5-0 to

a) Find reason to believe the Corcoran for Senate Committee and William Keck, as Treasurer violated 2 U.S.C. § 441a(f).

b) Find reason to believe Michael Goland violated 2 U.S.C. § 441a(a)(1)(A).

Commissioners Aikens, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Elliott recused in this matter.

2. Decided by a vote of 5-0 to take no action on Morris Amitay.

Commissioners Aikens, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Elliott recused in this matter.

3. Decided by a vote of 4-1 to approve the letters, orders and interrogatories attached to the General Counsel's September 21, 1984, report as amended in the meeting of October 2, 1984.

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

Attest:

10-2-84  
Date

*Mary W. Dove*  
Mary W. Dove  
Recording Secretary

35040511447

( ATTACHMENT I )

LAW OFFICES OF  
**DAVIS AND GOOCH**  
830 PENNSYLVANIA AVENUE, S.E.  
WASHINGTON, D. C. 20003 26 A 9:14  
(202) 543-3800

WILLIAM S. DAVIS •  
RAYMOND L. GOOCH •

• ALSO MEMBER NORTH CAROLINA BAR  
• ALSO MEMBER VIRGINIA BAR

DANIEL J. SWILLINGER  
OF COUNSEL

April 25, 1984

*MUR 1684*

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

Dear Mr. Steele:

This Complaint is being filed on behalf of Senator Charles H. Percy and Citizens for Percy '84, his principal campaign committee for the 1984 primary and general elections.

The following statements and representations are made upon information and belief.

INTRODUCTION

A Los Angeles businessman, Mr. Michael Goland, financed a substantial radio, television and direct mail campaign against Sen. Percy prior to the March 20, 1984 Illinois Republican Senatorial primary. Mr. Goland has reported these expenditures to the Commission as independent expenditures, which, under the Act and regulations, are not subject to contribution limitations. By reporting these expenditures as independent, he is stating that they were not made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of the candidate." 11 CFR §109.1(a).

In fact, as the following discussion and accompanying documentation demonstrates, these expenditures were made in coordination and consultation with the campaign of Rep. Thomas Corcoran, Sen. Percy's principal primary opponent.

This constitutes a major violation of the Act. Since the expenditures are not independent, they are contributions well in excess of the \$1000 per election limitation. The Act provides that in the case of a violation of the contribution limitations, the Commission may impose a fine equal to the illegal contribution; in this case, that means at least \$278,729.

### THE VIOLATIONS

As reported in the enclosed story from the March 8, 1984 Chicago Tribune (EXHIBIT 1), Mr. Goland is a California real estate investor. The Tribune article states that he has purchased over \$100,000 worth of radio and television time in Illinois attacking Sen. Percy. Mr. Goland's FEC filing puts the amount at \$152,090. (EXHIBITS 4 & 4a) Attached are transcripts of the advertisements he ran. In a radio ad Mr. Goland urges voters "to make a change in Illinois" and send a different person to the Senate (EXHIBIT 2); in a television spot (EXHIBIT 3) he states that the U.S. Senate is no place for someone with a voting record like Sen. Percy's.

In addition, Mr. Goland has funded a \$127,000 anti-Percy direct mail campaign. (See Sec. B).

All of these expenditures clearly advocate Sen. Percy's defeat.

#### A. The Amitay Connection

In Part 109 of the Commission's regulations, an "independent expenditure" is defined as an expenditure designed to influence an election which is not made:

with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or any authorized committee of the candidate.

11 CFR §109.1(a).

The Commission's regulations go on to state that the Commission will presume that an expenditure is not independent when it is made through a person authorized to raise funds for a candidate, 11 CFR §109.1(b) (4) (i) (B), or by someone who was told of the campaign's "plans, projects or needs." 11 CFR §109.1(b) (4) (i) (B).

Mr. Goland made these expenditures at the direction of Mr. Morris Amitay, an individual who was both an agent of and fundraiser for the Corcoran campaign. Mr. Amitay was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs. Consequently, further investigation will most likely show that Mr. Goland's expenditures were made with the knowledge of these plans and needs. These are two bases upon which the Commission can find that Mr. Goland's expenditures were not independent.

Mr. Amitay's relationship to the Corcoran campaign is amply documented. One of the very first fundraising letters sent out by the Corcoran campaign (EXHIBIT 5), contained an interview of Rep. Corcoran by Mr. Amitay. Furthermore, the February 13, 1984 issue of the Baron Report (EXHIBIT 6), a highly respected newsletter on politics, states that Mr. Amitay "is raising funds for and advising Corcoran." This is confirmed by a story in the March 3, 1984 Wall Street Journal (EXHIBIT 7). Clearly, Mr. Amitay is intimately connected with the Corcoran campaign.

(He has indicated that he intends to support Rep. Paul Simon in the general election, his sole objective being to defeat Sen. Percy.)

The relationship between Mr. Goland and Mr. Amitay is also well documented. Mr. Goland is a Board member of the Washington Political Action Committee; Mr. Amitay is the Committee's Treasurer. The two have thus had frequent opportunities to converse about the primary campaign. FEC reports show that Washington PAC has contributed to the Corcoran campaign on two occasions, once in 1983 and again this year.

However, it is not necessary to infer coordination or control between Mr. Amitay and Mr. Goland from the fact that they have had an opportunity to discuss the Percy/Corcoran race. Mr. Amitay has himself said that he controls Mr. Goland's political expenditures. In a February 24, 1984 letter to a Washington political fundraiser, Mr. Amitay stated that Mr. Goland did not "make a move without my o.k." (EXHIBIT 8). This is a clear admission that Mr. Goland's expenditures were at Mr. Amitay's direction. It conclusively shows that the expenditures by Mr. Goland have not been made independently of the Corcoran campaign.

#### B. The AB Data Connection

Mr. Goland also financed an anti-Percy letter (EXHIBIT 9) on behalf of Rep. Corcoran. This 90,000 person mailing was produced by AB Data, Ltd. of Milwaukee at a cost of \$27,639.60, according to Mr. Goland's FEC filing (EXHIBIT 10). He paid an additional \$100,000 for anti-Percy direct mail to an Arlington, Virginia firm (EXHIBIT 10a), which we believe to be part of the same coordinated effort.

AB Data is also the direct mail fundraising firm used by Rep. Corcoran, as evidenced by his FEC reports (EXHIBIT 11), which show the campaign paid AB Data nearly \$220,000 in 1983 and 1984, and still owes \$40,000 to AB Data. Jerry Benjamin, a direct mail consultant, is a principal of AB Data, and was a consultant to the Corcoran campaign. (EXHIBIT 12).

Charles N. Steele, Esquire  
April 25, 1984  
Page Four

Clearly, Mr. Goland was coordinating his direct mail efforts with those of Rep. Corcoran. It was no coincidence that, out of the hundreds of direct mail fundraising firms in the country, Mr. Goland picked the very same one which was servicing Rep. Corcoran.

Commission regulations, 11 CFR § 109.1(b)(4) and (5), and past enforcement matters (i.e. MUR 1424, Caputo, Finkelstein, NCPAC) hold that when a campaign and a person making expenditures on behalf of that campaign use the same fundraising agent, the expenditures are presumptively not independent. Mr. Goland's mailing was designed to assist the Corcoran campaign. Its content and timing were designed by Rep. Corcoran's direct mail consultant to provide the maximum benefit to the Corcoran campaign.

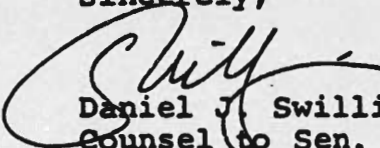
#### CONCLUSION

Expenditures which do not qualify as independent are treated as contributions to the candidate who benefitted from the expenditures. In Mr. Goland's case, this means he contributed more than 278 times the \$1000 legal limit to the Corcoran campaign. (According to FEC records, this is nearly 13 times more than anyone spent supporting or opposing Congressional candidates in 1982.)

The information provided herein is strong and direct evidence that Mr. Goland's expenditures were not permissible, and provides the Commission with an abundance of data more than sufficient to require the Commission to undertake an investigation of Mr. Goland's illegal contributions, and his intimate relationship with the Corcoran campaign and its agents.

Thank you for your prompt attention.

Sincerely,

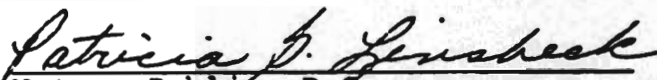
  
Daniel J. Swillinger  
Counsel to Sen. Percy and  
Citizens for Percy '84

Attachment - EXHIBITS

Washington  
District of Columbia: SS

SUBSCRIBED and SWORN TO before me this 25<sup>th</sup> day of April, 1984.

My Commission Expires January 1, 1987

  
Notary Public, D.C.

4

EXHIBITS

1. Chicago Tribune, March 9, 1984
2. Radio ad transcript
3. TV ad transcript
4. Goland telegrams reporting radio and TV expenditures
5. "CAN YOU NAME..." Corcoran fundraising letter
6. Baron Report, February 13, 1984 pp 3 and 4
7. Wall St. Journal, March 8, 1984
8. Amitay letter, February 24, 1984
9. Anti-Percy mailing, paid for by Goland
10. Goland telegrams reporting direct mail expenditures and Knabe letter.
11. Corcoran report
12. Daily Herald, July 7, 1983

35040511452

# Californian assails Percy in TV ads

By David Axelrod  
and Howard Wink

A WEALTHY California real estate tycoon prominent in Los Angeles Jewish circles has purchased more than \$100,000 worth of Illinois radio and television time for ads that attack Sen. Charles Percy (R., Ill.) as a "two-faced senator" who should be unseated.

The ads are to begin running Friday on WGN-TV (Channel 9), WGN-AM and at least eight Democratic radio and television stations, said a spokesman for the Chicago firm hired to produce them. The three network-owned stations in Chicago have declined to run the ads, the spokesman said.

The 30-second radio spot and 30-second TV ad feature the voices of a man and a woman alternately criticizing Percy for changing his position "every time the wind blows."

Michael Goland, the Californian who purchased the ads, said through a spokesman Thursday that he is not running the ads on behalf of any particular candidate. The radio ad, played for a reporter Thursday, closes with the statement: "Not authorized by any candidate or candidate's committee."

BUT KATHY LYDON, a Percy spokesman, charged that attorneys for the Percy campaign "have been given information that raises questions about the possible connection between this independent expenditure and our primary opponent."

Don Philmore, a spokesman for U.S. Rep. Thomas Corcoran, Percy's main opponent in the March 20 Republican primary, replied, "We have nothing to do with those ads."

Goland, who says he has business interests in Chicago as well as California, declined to be interviewed about his reasons for buying the ads, said Margaret Navolio, a vice president of the Andy, Scott & Madison advertising firm in Chicago, which was hired by Goland to produce the spots.

He did, however, release several comments through Navolio. "I have not made up my mind as to whom to support in the general election," Goland said in the



Ads criticize Sen. Charles Percy for changing his position "every time the wind blows."

statement. "But (I) do know that I am opposed to Sen. Percy's re-election because of his lack of consistent, effective representation in the Senate on a large number of issues."

NAVOLIO SAID Goland resented being asked whether his religious affiliation had motivated him. Percy, chairman of the Senate Foreign Relations Committee, is viewed by some U.S. Jewish leaders as being insufficiently sympathetic to Israel.

The ads make no mention of Percy's Mideast stands. They charge that he announced he was for an all-volunteer Army but voted for draft registration; claimed to be against the dumping of nuclear wastes but voted to deny states the right to veto sites; and vowed to oppose cuts in education funding but voted to reduce school nutrition programs and training for the handicapped.

Lydon denied each charge. Percy never voted for draft registration, she said; it was imposed by President Jimmy Carter. Percy has supported a combined state and federal approach to nuclear waste disposal, she said, and he has consistently voted for increased education budgets.

35040511453

Michael Goland :60 Radio Commercial -- "Two-Faced"

ANNCR: What would you say about someone who says one thing and does another? What would you think about a man who changed his position every time the wind blows? What do you call a politician who promises to stand up for you and then takes the other side?

In Illinois we call him Senator Percy. When he went to the Senate he said he was for an all-volunteer Army. But Percy voted for compulsory draft registration. Charles Percy said he was for states rights and against the dumping of nuclear waste. But he voted to deny states their right to veto nuclear dump sites within their borders.

Percy said he would never allow cuts in the funding of our children's education. But Percy voted against maintaining school funding, against education and training for the handicapped, and against school nutrition programs.

In this election year with so much at stake let's make a change in Illinois and send one face to the Senate, not two. The two-faced Senator is a real disadvantage.

Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

3 5 0 4 0 5 1 1 4 5 4



EXHIBIT 3

Kelly, Scott and Madison, Inc.  
One East Wacker Drive, Suite 3320  
Chicago, Illinois 60601  
312 828-9850

TITLE: "COLORS" (POLITICAL ADVOCACY)  
COPY: 30 SECOND TELEVISION  
CLIENT: MICHAEL GOLAND; INDEPENDENT EXPENDITURE

COLORS

OPEN ON: GREY LIMBO SETTING (TABLE TOP WITH SWEEP)  
FROM LEFT CORNER, SMALL CHAMELEON CRAWLS TO CENTER STAGE

V.O.

IN ALL THE YEARS CHARLES PERCY  
HAS BEEN IN THE SENATE, IT'S BEEN  
HARD TO KNOW HIS TRUE COLORS

BY THE END OF THE ABOVE, THE CHAMELEON IS CENTER STAGE AS CAMERA TRUCKS  
IN, THE CHAMELEON BEGINS TO TURN A SHADE OF RED

V.O.

WHEN WE SENT PERCY TO THE U.S. SENATE  
HE SAID HE WAS FOR AN ALL-VOLUNTEER ARMY

CHAMELEON TURNS TO A SHADE OF YELLOW

V.O.

BUT IN 1980 PERCY VOTED FOR  
-COMPULSORY REGISTRATION FOR  
THE DRAFT

CHAMELEON TURNS TO GREEN AS CAMERA PANS THE LENGTH OF ITS BODY

V.O.

PERCY SAID HE WAS AGAINST THE DUMPING  
OF NUCLEAR WASTE AND FOR THE RIGHT OF  
STATES TO CONTROL IT

PAN ACROSS OTHER SIDE OF CHAMELEON AS IT TURNS TO BLUE

35040511455

V.O.  
THEN HE VOTED TO DENY STATES  
THE RIGHT TO SITE NUCLEAR DUMP  
SITES WITHIN THEIR OWN BORDERS

CAMERA TRUCKS IN ON CHAMELEON'S HEAD AND EYES AS IT TURNS ORANGE

V.O.

IN MARCH OF 83 PERCY SAID HE WAS  
OPPOSED TO CUTBACKS IN FUNDING FOR  
EDUCATION

CHAMELEON TURNS PURPLE AS TABLE IS ROTATED SO THAT CHAMELEON APPEARS TO  
TURN.

V.O.

BUT PERCY VOTED AGAINST MAINTAINING  
FUNDING FOR OUR SCHOOLS, AGAINST  
EDUCATION FOR THE HANDICAPPED AND  
TO DENY MONEY FOR NEEDED SCHOOL  
LUNCH PROGRAMS

CAMERA PULLS BACK AS LIZARD IS SEEN FROM A STRAIGHT-ON POSITION

V.O.

PERCY SAID HE WOULD NEVER VOTE  
FOR A RED INK BUDGET

CHAMELEON CHANGES COLOR AGAIN

V.O.

THEN VOTED FOR THE LARGEST DEFICIT  
IN HISTORY...AND FOR A RAISE IN  
HIS SENATE PAY

PULL BACK SLOWLY AS CHAMELEON CHANGES COLOR MORE RAPIDLY

V.O.

IN TWENTY YEARS WE HAVEN'T LEARNED  
PERCY'S TRUE COLORS. BUT WE HAVE  
LEARNED THAT THE U.S. SENATE IS NO  
PLACE FOR A CHAMELEON

35040511456

0157P EST 13:57 FST

EXHIBIT 4

WU  
Western Union

Telegram

*GP* P 3/16/24 I47

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTHEAST  
WASHINGTON DC 20510

1924 MAR 16 PM 4:52

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY, TO ACHIEVE THIS I  
PAID \$16,700 TO KELLY, SCOTT, AND MADISON, 1 EAST WACKER DRIVE,  
CHICAGO, ILLINOIS 60601.

CC: ILLINOIS STATE BOARD OF ELECTION  
MICHAEL GOLAND  
20221 PRAIRE ST  
CHATSWORTH CA 91311

13:57 EST

IPMPOMX WSH

35040511457  
840200020916

0257P EST 14157

EXHIBIT 4a

Telegram

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTH EAST  
WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY, TO ACHIEVE THIS I  
PAID \$135,390.00 TO KELLY, SCOTT, AND MADISON 1 EAST WACKER DRIVE  
CHICAGO ILLINOIS 60601

MICHAEL GOLAND  
20221 PRARIE ST  
CHATSWORTH CA 91311

14157 EST

IPMPOMX WSH

84020062:0/8  
35040511458

RECEIVED  
EXHIBIT 4a

CAN YOU NAME  
ISRAEL'S  
WORST ADVERSARY  
IN CONGRESS?



*@ Perry*

35040511459  
FIRST CLASS POSTAGE WILL HELP



**BUSINESS REPLY MAIL**

FIRST CLASS PERMIT NO. 40 AURORA, IL

POSTAGE WILL BE PAID BY ADDRESSEE

attn: Lou Morgan

Corcoran Committee  
P.O. Box 2667  
Aurora, IL 60507

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



# We can defeat Charles Percy!

CA38  
MR. ARTHUR RUBLOFF  
1040 N. LAKE SHORE DR.  
CHICAGO, IL 60611

AZZ

Enclosed is my check for:  
☐ \$100 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50  
☐ \$25 ☐ Other \$ \_\_\_\_\_

Please make checks payable to: The Corcoran Committee  
P. O. Box 2667  
Aurora, IL 60007

To help us comply with F.E.C. filing requirements,  
please provide all the following information:

☐ Mr. ☐ Mrs. ☐ Ms. ☐ Mr. & Mrs. ☐ \_\_\_\_\_

NAME Last First

HOME TELEPHONE

OCCUPATION TITLE

FIRM/ORGANIZATION ☐ SELF-EMPLOYED

Please correct my address to:

Although we try to eliminate duplication, it is not always possible to prevent your receiving more than one letter. If you receive an extra copy, please pass it along.

## Morrie Amitay talks with Tom Corcoran

AMITAY:

Tom, U.S.-Israel relations has become a pivotal issue in the Illinois Republican Primary. Why is that?

CORCORAN:

U.S.-Israel relations is presently a hot topic of conversation all over the country, including Illinois. Because Percy has such a negative voting record on this issue and mine is just about the opposite, the public has naturally picked up on it. It defines a clear difference in our political philosophies.

AMITAY:

I know you have only a small number of Jewish voters in your district and that you are not Jewish. Why, then, are you a supporter of Israel?

CORCORAN:

Symbolically, I believe in Israel for many of the same reasons I believe in America. The people of Israel, by the depth of their hard work and high intelligence, created a modern, stable and democratic society from virtually nothing — much like the authors of our Constitution. When I first visited Israel, I knew immediately that I was in a free and vibrant country.

AMITAY:

Can you be a little more concrete?

CORCORAN:

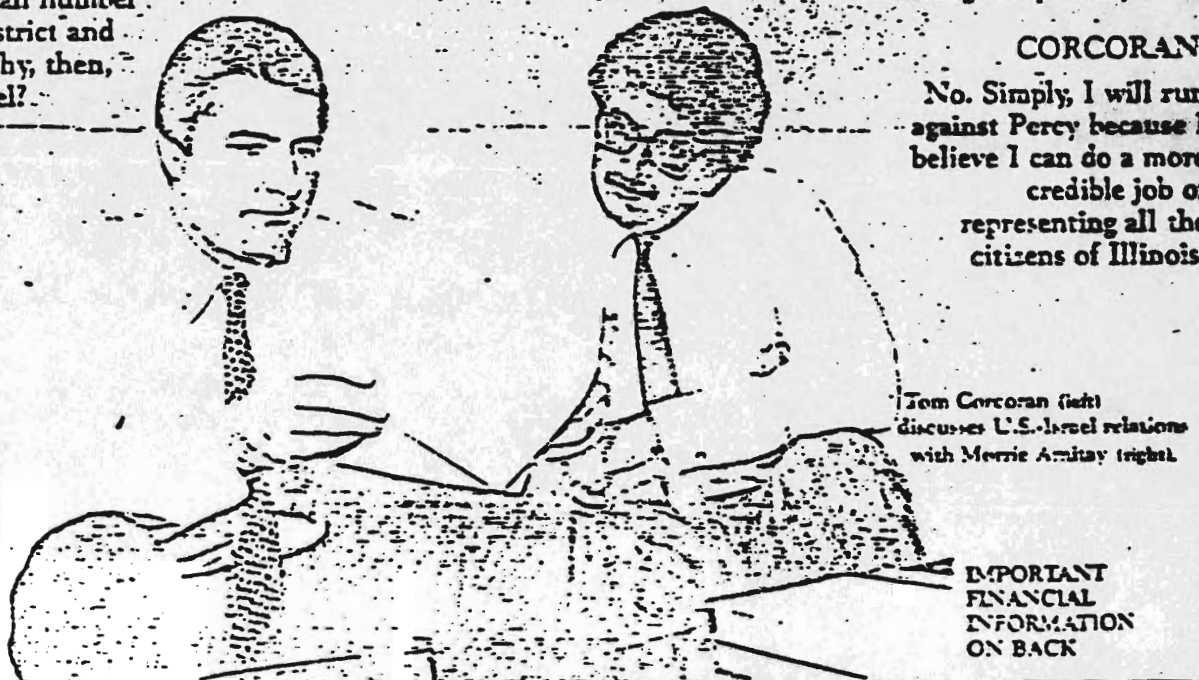
Sure. Israel is an ally. She is an invaluable friend of the United States. And, I am convinced that the national security of our country requires a strong and secure Israel. If we had a few more allies of Israel's quality, we — and the world — would be a lot better off.

AMITAY:

I take it your stance on Israel is not your main reason for entering the primary. Is it?

CORCORAN:

No. Simply, I will run against Percy because I believe I can do a more credible job of representing all the citizens of Illinois.



Tom Corcoran (left) discusses U.S.-Israel relations with Morrie Amitay (right).

IMPORTANT  
FINANCIAL  
INFORMATION  
ON BACK

Mr. Amitay is the former Executive Director of the American Israel Public Affairs Committee (AIPAC). Presently, he is a practicing attorney in Washington, DC, and a nationally syndicated columnist.

# FEDERAL ELECTION REQUIREMENTS

Individuals may contribute up to \$1,000 to the primary and \$1,000 to the general election. A husband and wife may each contribute up to the \$1,000 limit for each election. Each child under 18 may voluntarily decide to contribute up to \$1,000 towards each election from their own funds.

Partnerships may make contributions up to the aggregate individual limits of each partner. All partnership checks must either clearly indicate the partners to whom the contribution is to be credited and the amounts to be credited to each, or must be accompanied by a partnership breakdown by percentages and the contribution will be allocated in accordance with these percentages.

Corporations, Proprietorships and Unions cannot contribute to the committee except through corporate or union PACS.

Corporate, Union or Other Political Action Committees (PACS) filed with the Federal Election Commission may make contributions of up to \$5,000 to the primary and \$5,000 to the general election.

Your contribution is eligible for a federal income tax credit in the amount of one-half of the contribution. The maximum credit that can be claimed in one year is \$50 per individual or \$100 for married couples filing joint returns.

Your help in providing the names and addresses of friends and associates who would be interested in contributing would be greatly appreciated. Please enclose a list of these individuals with your reply card.

Paid for by The Corcoran for Senate Committee,  
Donald M. Cassidy, Jr., Treasurer

## Tom Corcoran

### Highlights from the record of a good friend

- Wrote a letter to President Reagan, urging him to lift the suspension of delivery of the F-16 aircraft to Israel (6/81).
- Voted to disapprove the sale of AWACS and offensive enhancement equipment for the F-15's to Saudi Arabia (10/81).
- Co-sponsored a concurrent resolution calling upon the Union of Soviet Socialist Republics to end the current policies of Jewish emigration discrimination and anti-Semitism (11/81).
- Voted for \$2.2 billion in military and economic assistance for Israel (12/81).
- Wrote a letter to General Jaruzelski, expressing concern over recent reports of officially sanctioned anti-Semitic statements made in the Polish media (2/82).
- Co-sponsored a concurrent resolution commending the State of Israel for its compliance with the Camp David accords (7/82).
- Wrote a letter to President Reagan, expressing opposition to the sale of advanced military weapons to Jordan unless King Hussein agrees to join the peace process. (Corcoran was the original signatory and key Republican spearheading the letter. It was sent with 182 signatures. 12/82)
- Wrote a letter to President Reagan, urging an end to the delay of the sale of F-16 aircraft to Israel (3/83).
- Recently brought out two "refuseniks" from the Soviet Union and continues to work tenaciously for the cause of Soviet Jewry.

"Tom Corcoran believes in America  
and her commitment to Israel."

if

In most Senate races this year, both parties' nominations are uncontested. In most of the exceptions, primary battles will be waged for the privilege of losing, or will not involve factors of national significance.

But a few primaries will be significant in measuring the impact of particular issues, ideological factions, constituencies, party organizations and campaign strategies and tactics. The first of these is in Illinois.

Republicans Since his close call last time, there's been no question that Sen. Charles Percy would face a primary challenge from the right. Percy worked to appease the opposition. Between 1977 and 1982, his ACA (conservative) Senate voting record rating skyrocketed from 10 to 56% and his Chamber of Commerce rating moved from 53 to 65%. Percy's ADA (liberal) rating fell from 65 to 45% and his rating from the AFL-CIO (which endorsed him last time), from 47 to 28%. Percy won the support of President Reagan, plus the vast majority of his state's GOP party and public officials. He has campaigned vigorously for months, and raised record funds. An early February statewide poll for WLS-TV puts him ahead of his New Right primary challenger, Rep. Tom Corcoran, 65-17%. Only 46% of the respondents could identify Corcoran and only 16% had an opinion of him.

Percy appears less vulnerable than other recent rightwing primary targets for two other reasons. First, the Illinois Republican party is much more non-ideological and moderate than many others. Second, charges that Percy is disloyal to Reagan could backfire: traditionally in American politics, even a President's partisans do not want their Senators to be "rubber stamps."

Nevertheless, Percy is not safe. He remains an anathema to rightwing activists, who are infuriated by liberal moves (such as meetings with Jesse Jackson); assert his changing voting record is a fraud and reflects lack of character; find him personally "pompous" and stereotypical of establishment elitists. One cannot underestimate the impact of such activists in a low turnout; nor should one overestimate how much the GOP organization can deliver for Percy. Most of its leaders back him because he's the incumbent and is more electable in November, rather than out of conviction.

Corcoran is bright and aggressive; he's been campaigning for over a year. Polls this early are highly unreliable in primaries, since few voters have focused on the race, so an upset remains possible.

One other factor: leaders of the pro-Israeli lobby view Percy as an arch-enemy. Morrie Amitay, a former aide to liberal Sen. Ribicoff (D-CT) and ex-director of the American Israel Public Affairs Committee, is raising funds for and advising Corcoran. Response has been less than hoped for; indeed, there's been somewhat of a pro-Percy "backlash" among moderate Jews offended by the nature of the anti-Percy appeals as well as Corcoran's ideology. (Amitay contends he'll switch to Rep. Paul Simon, the Democratic frontrunner, in November, even if Corcoran upsets Percy.)

Democrats Rep. Paul Simon, the strong frontrunner, hesitated before entering the race. As a newspaper publisher, state legislator and Lt. Governor from southern Illinois, Simon built a record as a progressive, "good government," reformer. He ran for the 1972 Gubernatorial nomination, with the endorsement of the party organization, including Chicago's Mayor Daley. But ironically, Simon was labeled the machine candidate and lost to maverick Dan Walker. In 1974 he was elected to the House, where he has become a leader on education and labor issues. Despite a narrow race in 1980 (after backing Kennedy against Carter in his conservative district and facing a GOP opponent named John Anderson), Simon's House seat is secure. But national Democratic, liberal, labor and Jewish leaders convinced him to take on Percy.

State party leaders found Simon fully acceptable, but top ones would not

reject a bid for support from Phil Rock, the aggressive State Senate President and party leader. Rock's power has helped him recruit not only organization Democrats, but Hispanics, unions (like AFSCME) and others he's helped in Springfield. (The AFL-CIO split 47 Simon, 12 Rock, 1 Burris and 39 for no endorsement, which prevailed, since a 2/3 vote was needed for one.) Rock is backed by the white faction of the Chicago party, led by Alderman Eddie Vrdolvak. (But most downstate county chairs back Simon.)

Chicago Mayor Harold Washington is not active in the race. Indications are that he personally prefers Simon. But, he expresses loyalty to the organization. And the third candidate, black State Controller Roland Burris, makes it impossible for him to move in any direction. For Washington, that may be complicated, but it's certainly convenient. Mathematically, Burris, a banker and moderate, could conceivably win a plurality in the four way race, if blacks bloc vote. But there's little likelihood of that: Burris is having money problems, poll results are discouraging, and he may even drop out.

The fourth contender is Alex Seith, a Chicago Ivy League attorney who served as the Daley machine's spokesman in Party reform battles. Seith scared Percy in 1978, but lost the 1980 primary to Sen. Dixon, drawing 19% of the vote. Seith's already spent some \$500,000 of family money (primarily) on Chicago TV. And it's had an impact, as the following polls indicate.

The February WLS-TV survey reported Simon 31%, Seith 20%, Burris 9%, Rock 9%. A late January poll by WBBM-TV reported Simon 34%, Seith 14%, Burris 12%, Rock 9%. (In Chicago, the figures were, respectively, 26%, 15%, 14%, 13%.)

### GETTING GOD INTO POLITICS

President Reagan is seeking to make prayer in public schools a major campaign issue, after ignoring it since the last campaign. "Voluntary" prayer is favored by about 75% in polls; that's a strong consensus, even though it's less than the level of support for sex education. (Parents are pragmatic.) And Democrats are, for the most part, terrified of taking Reagan on on it.

If they did, they might be surprised at the public's good judgement. In the polls, the main reason given for favoring school prayer is that people have the right to pray anywhere they want. What RR proposes is not "voluntary," but "non-compulsory" prayer. When such prayer was allowed, the few school children with the courage to opt out were generally told to wait in the hall or the principal's office. Finally, the only two possible sources for classroom prayers - those of particular religious groups and those drafted by government agencies - each would meet with strong opposition.

That's why rightwing Sen. Orrin Hatch (R-UT), among others, advocates legislation allowing a "moment of silence" in classes. That concept has drawn support from such respected liberals as Rep. Barney Frank (D-MA), provided, obviously, there's no instruction to silently pray. But Reagan's rejected that alternative, as it would cost him his "they've taken God out of the schools" rhetoric. One question he does not address: if he believes the Supreme Court has the ability to remove God from the schools, does he also believe the Supreme Soviet has succeeded in removing God from Russia?

Human Events, the "house organ" of New Right Republicans, has opened the 1984 political/religious campaign on other fronts. Its most recent issue includes attacks on the National Council of Churches and Islamic leaders, and Reagan's address to the Religious Broadcasters, which, he concluded with Christian prayers. The issue also exposed Walter Mondale's brother, a retired Minister nearing eighty. Lester Mondale, it seems, is a "Humanist" and "Humanists" favor sex education and the nuclear freeze. The article admits that Walter is Presbyterian, not "Humanist", but it reports that he does not attend church often.

*[Handwritten signature]* 16

## Humbling Fight

### Despite His Prestige, Sen. Percy Runs Scared In the Illinois Primary

Foreign Affairs Panel Chief  
Is the Only GOP Senator  
Facing Such a Challenge

### III Luck of Two Predecessors

By DENNIS FARMER

Staff Reporter of THE WALL STREET JOURNAL  
DECATUR, Ill.—"I just love these town hall meetings!"

Speaking across the month Illinois primary, Sen. Charles Percy, the costume boy wonder of Illinois Republican politics, was putting a convincing face on a dubious argument. Half a world away, in Moscow, dignitaries from many nations were assembling to bury Yuri Andropov. But to hear the chairman of the Senate Foreign Relations Committee tell it, the pagentry of Red Square didn't hold a candle to the El-fingham Best Western, which he had just left, or the Decatur Holiday Inn, to which he was heading.

"Not for me. I wouldn't want to be there," Sen. Percy confided in his rich senatorial baritone. "With my schedule this week—you've seen my schedule—can you see me canceling out to be in Moscow? I would have been miserable over there."

Maybe. Trouble is, Sen. Percy, who didn't press hard to go to Moscow, can hardly be estate over here. For the senator, who has long been dogged by a reputation for pomposity and by grumbling that he is more at home on the streets of Paris, France, than Paris, Ill., is running scared. Again.

The senator survived a harrowing 1979 Democratic challenge, mostly because of his opponent's mistakes and his own show of humility. "I've got the message," he assured voters then. Now, he is being tested within his own party, in the March 20 Illinois primary. He is the only GOP senator to face a primary challenge. Most Illinois Republican officials predict that he will survive: a recent Chicago Sun-Times/Channel 5 News poll showed him leading by 71% to 29%. But even if he does survive, Sen. Percy will go into a difficult fall campaign in weakened political condition. Four Democrats are vying to take him on.

So, once again, Illinois voters are witnessing the spectacle of a man who has always eyed the distant horizons—only to keep bumping into the here-and-now. It is an object lesson in how the uncertainties of political life can humble the proudest ego, thwart the grandest dream.



Sen. Charles Percy

Chuck Percy is the stereotypical man in a hurry. At age 29, he was named to head Bell & Howell—the youngest chief executive of a major corporation in the nation. Elected to the Senate at 37, he was immediately portrayed as presidential timber, the hope of the "Rockefeller wing" of the GOP. He did little to discourage such portrayals. And in the midst of Watergate, which prompted an upheaval in Republican presidential politics, he began actively exploring a 1976 presidential run.

But then died after Gerald Ford took hold of the White House. In retrospect, that time marked the high tide of the Percy career. Today, at 64, the blond hair has gone to gray, the GOP's "Rockefeller wing" has crumbled, and Charles Percy must run very hard just to stay where he is.

"Chuck Percy will be defeated in 1984," asserts his only out-of-primary opponent, Tom Corcoran, a conservative four-term congressman who likes to joke that, if elected, he would be the first senator from Notre Dame. "It's just a question of whether he is defeated in the primary or the general," Rep. Corcoran says, adding:

"In the past, he has always taken Republicans for granted, then reached out for labor, blacks and Jewish voters. But this year, labor wants a Democratic Senate, blacks are going to vote a straight Democratic ticket and Jewish voters are upset over his attitude toward Israel. Chuck's coalition has fallen apart. Time has caught up with him."

Rep. Corcoran, who talks of spending up to \$1.4 million in his primary-election effort.



POLITICS  
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Next drama spotlight in Georgia's Democratic primary. (Page 62)

has assembled an odd coalition of his own: hard-line conservatives of the New Right, liberal-leaning Jewish contributors and a scattering of grass-roots GOP workers. The New Right activists helped persuade him to run and lent him campaign start-up money. Some Jewish contributors, out to punish Sen. Percy, are pumping contributions into the Corcoran campaign. But if he does pull it off, the disgruntled grass-roots workers will probably be the surprise factor.

"A lot of precinct captains have had it with Percy," says Don Totten, an important Corcoran backer who headed Ronald Reagan's 1980 Illinois campaign. "The key is whether they reach out and bring others in."

Please Turn to Page 22, Column 1

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# Humbling Fight: Despite His Prestige, Sen. Percy Is the Only GOP Senator to Face Primary Challenge

Continued From First Page

voters to Corcoran. It's an uphill fight. But if they do reach out, and if the turnout is low, then Corcoran could surprise." The Corcoran hope is that the independent voters who might normally back Sen. Percy will be attracted to the more interesting Democratic presidential primary this time, leaving the field to more conservative Republican voters.

Sen. Percy, though, is leaving little to chance. He will spend \$1.5 million or so in the primary campaign. Former President Ford campaigned for him. Sen. Percy has launched an expensive series of television ads, something he once said would be unnecessary in the primary. He is busily setting up a telephone-bank operation. And he is working tirelessly.

"I had a report this morning from Quincy," Gov. James Thompson quipped in introducing the senator recently. "A man stopped to tie his shoelaces: Chuck Percy talked to him for 20 minutes. Last week in Chicago, two elderly ladies passed while crossing the street, and Chuck Percy was there, talking about the deficit."

## Major Supporters

From "Big Jim" Thompson and House Republican Leader Robert Michel on down, a phalanx of Illinois Republican heavyweights supports the embattled senator. Under the governor's watchful eye, the big Lincoln Day lunch at Springfield last month turned into an unofficial Percy rally. Huge buttons distributed at the door juxtaposed pictures of the senator and Abraham Lincoln, the governor introduced the senator as "an Illinois treasure," and the official program featured 19 Percy photographs.

Still, there is an air of faded glory about the Percy campaign, and about the senator himself, an air of a man who has gone as high as he is going to go. "Time and opportunity have passed him by," Mr. Tollen says. "If he wins reelection, I think this will be his last term."

What he has attained—the prestigious Foreign Relations Committee chairmanship—is a lot. But recent political history hasn't been kind to the committee's chairmen. Predecessors J. William Fulbright and Frank Church both lost reelection bids. Something about the job, with its glamorous trips to foreign capitals and its preoccupation with the rarefied issues of statecraft, doesn't sit well with ordinary voters. And it is one of the ironies of Sen. Percy's life that his performance as chairman has given Tom Corcoran issues to exploit.

## Earlier Moscow Trip

"Remember when Senator Percy went to Moscow and embarrassed Ronald Reagan?" asked one early Corcoran television spot. This refers to a Percy trip, at the dawn of the Reagan presidency, in which the senator intimated to Soviet leaders that Mr. Reagan was more receptive to arms limitation than in fact he was. The spot then cuts to Rep. Corcoran, standing beside an American flag. "Congressman Tom Corcoran—an Illinois Congressman America can count on."

The controversial Corcoran speaks with an arm-waving, guttural voice. Jesse Jackson, the black Democratic presidential candidate, haranguing a crowd. When push comes to shove, Jesse Jackson knows he can count on Charles Percy. The

This refers to the briefing the senator gave Mr. Jackson before the Syrian trip that freed U.S. ship Robert Goodwin. Although President Reagan publicly thanked Mr. Jackson at the White House, Rep. Corcoran nevertheless argues that Sen. Percy shouldn't have got involved in the quagmire venture of a Democratic presidential candidate.

Sen. Percy charges the spot has "racist implications," and adds depict it as an attempt to win white ethnic voters in the Chicago area, where racial tensions were heightened by last year's election of Harold Washington, a black, as Chicago mayor. Rep. Corcoran denies the charge but acknowledges that he is focusing his campaign on Cook County, which casts roughly 20% of the vote in a typical Illinois Republican primary, and the surrounding "collar counties."

The ad referring to Jesse Jackson has drawn editorial criticism. And efforts by some Jewish contributors to defeat Sen. Percy have generated a sympathy backlash.

## Israel Issues

These contributors are angry that the senator quickly criticized Israel's invasion of Lebanon in 1982 and, over the years, has shown some sympathy for the claims of Palestinians. Morris Arnsky, the former executive director of the American Israel Public Affairs Committee, is supporting Mr. Corcoran in the primary, though he would back Democratic Rep. Paul Simon in the general election. And a fund-raising letter from Louis A. Morgan, a Northfield, Ill., business executive, has portrayed Sen. Percy as "Israel's most powerful adversary" in the Senate. But in response to such tactics, former New York Sen. Jacob Javits and 58 Illinois Jewish leaders recently signed a letter defending the senator.

In the closing weeks of the campaign, Mr. Corcoran will hammer on the theme that Sen. Percy is more liberal than the average Republican voter or President Reagan. "Chuck's always been pretty good at keeping a bushel basket over his voting record," he says. In response to the Corcoran charge that he isn't a true Republican, the senator demands, "Who is he—God or someone?" In any case, the challenger's task has been complicated by Mr. Reagan himself.

The president lauded the senator as "a major American statesman and an outstanding salesman for Illinois" at a January 1983 fund-raising dinner. Rep. Corcoran, an under-

clered candidate at the time, held his own counter-dinner in the same hotel. But Mr. Reagan didn't drop by, not even after Corcoran had him escorted on the floor to get his attention. The president did declare his neutrality once Mr. Corcoran had formally entered the race, but the damage had been done. Today, the "outstanding salesman" statement is the centerpiece of a Percy television commercial.

## Ties to Reagan

In other ways, too, the senator daffily wraps himself in the Reagan mantle. "All those who think the president did the right thing in going into Grenada, say 'Aye!'" he directs his audience, and promptly votes ye himself. "We" have stopped the spread of communism in the Caribbean, "we" have cut spending and "we" have cut taxes, he says. "Finish the job! That's why he's running, and that's why I'm running."

Trying to avoid the issue of predecessors

Fulbright and Church, Sen. Percy argues that his Foreign Relations chairmanship is more than just a ticket to champagne receptions in freeway capitals. In fact, he says, it is "the Illinois advantage." It allows him to promote Illinois exports and to wring more defense contracts out of the Pentagon.

His signs are lower now, the senator seems to say as he shuffles consistently between the Chicago megapole and the downstate cornfields. The White House dream is behind him. And he has changed his mind about some things, including the virtues of being a senior senator.

"I can well remember the day I walked into Sen. Dirksen's office as a freshman and said, 'Ev, there's got to be a better way than this seniority system,'" he told a Springfield audience. "And Everett Dirksen said, 'Chuck, the longer you're here the more the system will grow on you.'"

"What a man of foresight and vision."

## Dixon Ticonderoga Co.

VERO BEACH, Fla. — Dixon Ticonderoga Co. said it sold its plant properties in Jersey City, N.J., to Dixon Venture, a development partnership, for \$3 million in cash and notes.

Proceeds were used to reduce bank debt, the company said.

Dixon Ticonderoga, a pencil, art material, crayon and real-estate development concern, said that it leases back for two years one of the plants, which is used for manufacturing industrial crayons and graphic leads.

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WASHINGTON, D.C. 20001

2-24-77

! Kim -

The identifiable Republicans  
are circled - for your  
convenience! (but no one  
makes a move without my o.k.)

Wam

[illegible]

BULK RATE  
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Michael Goland  
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#807  
Chicago, IL 60659

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Sen. Charles Percy with Saudi Arabian Ambassador Faisal Alhegelan.

# Charles Percy— FRIEND OR FOE OF ISRAEL?

Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

# **SOME QUESTIONS & SOME ANSWERS ABOUT THE PERCY RECORD.**

**1**

## **■ Is Charles Percy a friend of Israel?**

Let's look at the facts—

On one hand, in his 17 years in the Senate, Percy has supported foreign aid, including aid to Israel, and has worked on behalf of Soviet and Ethiopian Jews. But, at the same time, Percy led the Senate fights for the sale of deadly F-15 fighter bombers and, later, sophisticated AWACS aircraft to Saudi Arabia; called for a Palestinian state headed by Yasser Arafat; opposed additional aid to Israel; and was the first Senator to urge the suspension of the sale of F-16s to Israel.

Which leads to a second question...

**2**

## **■ Has Charles Percy changed his position on Israel in recent years?**

Yes. Until early 1975, Percy was regarded as consistently pro-Israel. But upon his return from a tour of the Middle East, he made a 180-degree switch calling Yasser Arafat a "relative moderate" and branding Israel as "intransigent." These Percy positions have continued since 1975 on a series of Middle East issues.

**3**

## **■ How important was Charles Percy in the AWACS fight in Congress?**

Percy led the bitter fight to sell the ultra-sophisticated AWACS aircraft to Saudi Arabia. The night the AWACS sale was approved, Charles Percy left the Senate chamber to attend a victory celebration at the home of the Tunisian ambassador. In his book, *Arab Reach*, Hoag Levins described the scene at the Embassy.

After months of vicious debate and brutal political infighting, the Senate had cast a momentous 52-48 vote in favor of the Arabs and against Israel. And throughout the night, the halls resounded with the glee of a crowd whose members told and retold the story, and toasted and retoasted the defeat of Israel.

Some of the loudest toasts were from John Tower, Chairman of the Senate Armed Services Committee, and Charles Percy, Chairman of the Senate Foreign Relations Committee. Each had played a crucial role in undercutting the Israel lobby's campaign during the bruising months of struggle. Tower and Percy threw their arms around each other as the Arab banquet crowd cheered.

"Here was the great guy," said Percy, hefting his champagne goblet to Tower.

Tower hoisted his own goblet to Percy. "Here was our leader," he said, beaming.

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## What are Percy's views on Arafat and the P.L.O.?

Percy characterizes Arafat as a "relative moderate" compared to George Habash, the mastermind of the Munich massacres. In 1980, Percy visited Moscow and met with Kremlin leaders. U.S. Embassy cablegrams revealed that Percy told the Soviet officials that he favored an Arafat-led Palestinian state because, "this would permit Arafat to realize his wish to be chief of state."

5

## Does Charles Percy always support aid to Israel?

No. Since becoming chairman of the Senate Foreign Relations Committee, Percy has at times opposed increases in the aid figures. Consider these examples from just 1982 when Percy:

- Pledged on "Face the Nation" to cut aid levels to Israel already approved by a majority of his own Foreign Relations Committee;
- Opposed the Boschwitz Amendment to convert \$300 million in loans to Israel to grants for Israel;
- Opposed the Cranston Amendment to add \$125 million in economic assistance to Israel;
- Voted against an amendment allowing an additional \$225 million in foreign aid to Israel.

6

## Have Percy's Arab business dealings influenced his position on Middle East issues?

This is a hard question to answer definitively. Percy sits on the board of Chase Manhattan Bank and other banks that have interests with the Saudis and other Arab governments. And in 1976, Percy led the fight to block disclosure of the extent of Arab countries' deposits in American banks. These two facts may or may not be related. You must decide.

7

## Is it better to support Percy and hope he changes—or work to defeat him in 1984?

Again, this is something for you to decide. What seems clear is that Charles Percy is not likely to change. The last time he ran for re-election, Percy was in trouble in Illinois and within the Illinois Jewish community. On the eve of the election, he admitted that he had made mistakes and promised to change. The Percy record over the last five years suggests that was an empty promise, including his recent castigation of Israeli policies to Prime Minister Shamir during his visit to Washington.

Most political observers believe that Percy is facing the most serious challenge of his political life. He faces a strong challenge in the Republican primary and, if he survives, he must face one of four Democrats—all of whom have the ability to run a strong Illinois campaign and all of whom would probably be more supportive of closer U.S.-Israel ties.

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By now you have probably heard a lot about the record of Charles Percy on the State of Israel. And you may be confused because of the conflicting stories you've been told. Those who support Charles Percy's re-election to the Senate offer one description of his record while those who oppose his re-election present a quite different set of facts.

By now you may be wondering what the truth really is—where Charles Percy really stands on the issue of a close U.S.-Israel friendship.

While Percy's position on the Middle East is not the only issue confronting Illinois voters, it is certainly worthy of very close attention. For Charles Percy's influence as Chairman of the Senate Foreign Relations Committee is enormous and his actions have a tremendous effect on the quality of the U.S.-Israel relationship.

To clear up the confusion, we asked some direct and important questions about what Charles Percy has said and done in his 17 years in the Senate.

**What we found is contained  
inside—  
and it shows that while Percy  
claims he is not a foe,  
he is certainly no friend . . . .**

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TELEGRAM

HAND DELIVERED

SECRETARY OF THE SENATE RPT DLY MGM, DLR  
 119 D ST NORTH EAST  
 WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 90,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES W PERCY. TO ACHIEVE THIS  
 I PAID \$27,639.50 TO A E DATA LTD 8050 NORTH PORT WASHINGTON ROAD  
 MILWAUKEE WISCONSIN 53217

MICHAEL GOLAND  
 20221 PRARIE ST  
 CHATSWORTH CA 91311

14:53 EST

IPMPCMX WSH

RECEIVED  
 CLERK OF THE SENATE  
 MAR 15 PM 5:00  
 AND DELIVERED

85040511471

4-034596S074 03/14/84 ICS IPMBNGZ ESP POMH  
 8183493661 TDBN CHATSWORTH CA 39 03-14  
 0316P EST 15:17 EST

western union

Telegram

SECRETARY OF SENATE RPT DLY MGM, DLR ASAP  
 229 D ST NE  
 WASHINGTON DC 20510

MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 300,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY, TO ACHIEVE THIS  
 I PAID \$100,000 TO C. L. C. O, INC, 2525 WILSON BOULEVARD, ARLINGTON,  
 VIRGINIA 22201.

MICHAEL GOLAND  
 120221 PRAIRIE ST  
 CHATSWORTH CA 91311

15:17 EST

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## Illinois Citizens for Political Integrity

P.O. Box 9534

Downers Grove, IL 60515



Dear Illinois friend:

I want a conservative U.S. Senator elected in 1984 to help Ronald Reagan. You may not know, me, I'm Robert Knabe - a Chicago Reagan supporter - and I was shocked to learn recently just how liberal Chuck Percy really is.

It may surprise you to learn the truth, but every six years Chuck Percy campaigns as a conservative to convince you that he's not a liberal. He is a liberal, he's no friend of Ronald Reagan, and he doesn't represent Illinois.

As Chairman of the Senate Foreign Relations Committee, he's the most powerful man in Congress on foreign policy. When you look at his record, you'll know we need to replace him in the U.S. Senate.

There is an alternative - a real choice for our U.S. Senator. He's Congressman Tom Corcoran, a genuine Reagan Republican.

Illinois State Representative Penny Pullen said in endorsing Tom Corcoran,

"Percy represents the failed policies of the past. Corcoran is a staunch defender of America's interests in foreign affairs and national defense."

Nationally syndicated columnist M. Stanton Evans said,

"Senator Percy is out of touch. If you simply examine his issue positions...it is very clear not only that Percy's issue positions are out of step with the stated positions of the Reagan Administration, but with majority public sentiment as well."

Let's look at just a few issues - and Chuck Percy's stands:

- \* Mr. Percy cast the deciding vote in the Senate against Ronald Reagan's 1984 budget - resulting in higher spending and deficits.
- \* Mr. Percy voted for the high tax bill which contained the 10% withholding tax on interest and dividends.
- \* Mr. Percy voted to give \$75 million to Marxist Nicaragua, and called for diplomatic recognition for Fidel Castro's Cuba.
- \* Mr. Percy voted to give away our Panama Canal.
- \* Mr. Percy opposes President Reagan's efforts to enact a school prayer Amendment to our Constitution.
- \* Mr. Percy opposed efforts to end forced busing to achieve racial quotas in our schools.

Mr. Percy undermines Ronald Reagan's peace efforts in the Middle East by referring to the terrorist Yassir Arafat as "moderate."

When challenged on his liberal voting record in 1978 by his Democrat opponent - who was more conservative - Mr. Percy knew he was in trouble.

He called in Ronald Reagan to ask him to save Percy's Senate seat.

This was the same Chuck Percy who in 1975 had called Ronald Reagan a man with "neither an adequate understanding of complex national and international issues," nor "the required vision" to be president.

Mr. Percy promised he'd learned his lesson - he'd mend his ways by listening to the people if they would only re-elect him Senator. He promptly forgot the promise.

To repay Ronald Reagan for his 1978 help, Chuck Percy helped Mr. Reagan's opponent for the presidency in 1980! After the Republican convention nominated Reagan for President, Mr. Percy and his wife both donated \$500 to John Anderson's independent candidacy against Reagan.

FURTHER REPAYING RONALD REAGAN, CHUCK PERCY SUPPORTED JIMMY CARTER MORE THAN HE HAS RONALD REAGAN AS PRESIDENT.

Unfortunately for Mr. Percy, Illinois voters have a longer memory than he does. Another Illinois president - Abraham Lincoln - wrote,

"You can fool some of the people some of the time,  
but you can't fool all of the people all of the time."

Those who believed Chuck Percy's 1978 promise to reform were fooled. They didn't appreciate it - not a bit!

They won't be fooled again. Chuck Percy will never again win their votes. He can't win without them. If nominated, he'll lose in November.

So, Illinois Republicans have a choice We can nominate Chuck Percy - a sure loser in November - OR WE CAN NOMINATE CONGRESSMAN TOM CORCORAN - A MAN WHO WILL WIN THE NOVEMBER ELECTION!

Of course, Illinois Republicans want more than just a Senator.

WE WANT A SENATOR WHO VOTES IN WASHINGTON LIKE HE TALKS IN ILLINOIS!

WE WANT A SENATOR WHO WILL BE LOYAL IN SUPPORTING RONALD REAGAN!

WE WANT A SENATOR WHO SUPPORTS LOWER TAXES, LOWER FEDERAL SPENDING AND OPPORTUNITY FOR US, OUR CHILDREN AND OUR GRANDCHILDREN.

WE WANT TOM CORCORAN!

Few Congressmen have made more impact on important legislation in Washington than this 44-year-old, four-term Representative.

A native of Ottawa, Illinois, Tom Corcoran graduated from Notre Dame University, served as an officer in the U.S. Army, became a successful businessman and is the father of five children.

Tom Corcoran is not a career politician. He was Vice-President of the Chicago and North Western Railroad when he decided he should be helping make America great again as a citizen-legislator.

Tom Corcoran defeated a liberal Democrat in 1976 to win his seat  
more...

in Congress, but he's been far more than a seat warmed in the House.

Since his election, Tom Corcoran voted just like he promised to vote. He has a solidly conservative, pro-defense, pro-energy, pro-family and pro-America voting record which has re-elected him with large margins.

Tom Corcoran has earned his pay - even though he voted against raising it. MULTI-MILLIONAIRE CHUCK PERCY VOTED TO RAISE HIS OWN PAY!

Tom Corcoran serves on the important Energy and Commerce Committee where he is credited with stopping the legislation which would have greatly increased natural gas prices without adding to gas supplies.

His pro-energy achievements are helping us to have the energy we need to heat our homes, fuel our cars and keep our jobs, but he's done much, much more for us and this nation.

HE WAS ONE OF THE MOST EFFECTIVE ADVOCATES OF THE REAGAN TAX CUTS WHICH REDUCED YOUR PERSONAL INCOME TAXES BY 25% OVER THE LAST 3 YEARS.

TOM CORCORAN CONSISTENTLY SUPPORTS LIMITING THE GROWTH OF FEDERAL SPENDING TO TRY TO BALANCE THE FEDERAL BUDGET.

CONGRESSMAN CORCORAN SUPPORTS THE CONSTITUTIONAL AMENDMENT TO BALANCE THE BUDGET. HE'S FED UP WITH \$200 BILLION DEFICITS EACH YEAR.

When liberals like Chuck Percy voted higher taxes in 1982 with the promise of lowering spending by \$300 billion, Tom Corcoran voted "NO!"

He knew there would be no spending cuts, only tax hikes. He was right. TOM CORCORAN AGREES WITH PRESIDENT REAGAN'S STATEMENT,

"PEOPLE AREN'T TAXED TOO LITTLE - GOVERNMENT SPENDS TOO MUCH."

Instead of cutting spending and deficits as Percy promised, the 1982 deficit of \$110 billion grew to \$194 billion in 1983. Clearly the big taxing Chuck Percy doesn't represent you. Tom Corcoran does.

Chuck Percy claims to be a Republican - but you be the judge!

Mr. Percy voted with the Republican Party 42.8% of the time.

Mr. Corcoran voted with the Republican Party 83.8% of the time.

Who best represents you in Washington - Chuck Percy or Tom Corcoran?

If you want to elect as your Senator a solid, proven, loyal Reagan conservative with the integrity you admire in political office, Tom Corcoran is your choice.

If you want a respected Republican - a firm supporter of President Reagan - a Senator who will help stop the massive national disgrace in deficit spending by the liberals, Tom Corcoran is your man.

The Republican primary in Illinois is on Tuesday, March 20, 1984.

more...

That's not far away, so mark March 20th on your calendar.

TOM CORCORAN NEEDS YOU. HE NEEDS YOUR VOTE. HE REALLY DOES!

You see, Chuck Percy has a massive warchest he's using to try to fool the voters of Illinois again into thinking he's really a conservative. He's trying to make the people think he supports Ronald Reagan - again.

Tom Corcoran - the real Reagan supporter in Congress - has limited funds for his campaign. He has run a campaign of the people, and that means that only with the help of men and women like you all across the state of Illinois - taking the time and effort to vote - can he win.

So, please complete the TOM CORCORAN SUPPORT FORM right now, and return it to me today in the return envelope I've also enclosed for your easy use. I'm not asking you to donate, just to support Tom with your vote and help in getting friends, neighbors and relatives to vote for Tom as well.

Here's what YOU CAN DO - TODAY!

1. Complete and return the enclosed TOM CORCORAN SUPPORT FORM.
2. TELL YOUR FRIENDS AND OTHERS ABOUT TOM. GET THEM TO THE POLLS ON ELECTION DAY - TUESDAY, MARCH 20, 1984.
3. Volunteer to help TOM CORCORAN be elected U.S. Senator.

Please don't allow this day to end without completing and returning your TOM CORCORAN SUPPORT FORM in the enclosed return envelope.

Remember, your effort today will help America's tomorrows to be blessed with freedom, economic prosperity and integrity in political office.

Thank you for your concern - and your efforts. With deep appreciation, I remain

Most sincerely yours,

  
Robert Knabe

P.S. We worked hard to nominate Ronald Reagan in 1976 and to elect him in 1980. Now we must work to re-elect him - and to send him a U.S. Senator who will support his policies. That means Congressman Tom Corcoran, a loyal Reagan supporter. The winning ticket for 1984 is REAGAN-CORCORAN!

P.P.S. Don't forget - primary election day is Tuesday, March 20, 1984.

# Tom Corcoran Support Form

Dear Robert:

I agree with you that our U.S. Senator must be a man of integrity, one on whom we can rely to vote the same way in Washington, D.C. as he says he will in Illinois.

I know that Chuck Percy promised to listen to the people in 1978, only to forget us when he returned to his comfortable Senate seat.

I want the Republican Party to control the U.S. Senate, and I understand that Illinois voters aren't going to be fooled by Percy again. I want to nominate a conservative who can be elected in November and who can help President Reagan win the election.

Tom Corcoran is the type of conservative leader Republicans can rely on to be consistent. He's a man of genuine integrity.

☐ I'll vote for Tom Corcoran on primary election day - Tuesday, March 20, 1984.

☐ I'll tell my friends, neighbors and family members about Tom's campaign - and help them to get out to vote on primary day.

☐ I'll volunteer to help Tom Corcoran's campaign for the U.S. Senate. Please contact me at the address (or phone number) below.

☐ I've listed the names and addresses of others I think will help Tom Corcoran win the U.S. Senate seat this year.

Please Print.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Federal Election Commission regulations require that we ask the following information.

Occupation: \_\_\_\_\_

Business firm: \_\_\_\_\_

★ ICPI, P.O. Box 9534, Downers Grove, IL 60515★

Paid for by Michael Goland, and not authorized by any candidate or candidate's committee.

35040511477

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FROM:

PLACE  
STAMP  
HERE

Illinois Citizens for Political Integrity  
P.O. Box 9534  
Downer's Grove IL 60515



Illinois Citizens for Political Integrity  
P.O. Box 9534  
Downer's Grove IL 60515

*Handwritten signature and date: 12/18/11*



DULK RATE

PLEASE OPEN  
IMMEDIATELY!  
ILLINOIS IS  
COUNTING ON YOU!

| Name of Committee (in Full)   | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|-----------------------------|---------------------|---|
| <b>Corcoran for Senate Committee</b>  |   |                             |                     |   |
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>Savin Corporation</b><br><b>1400 E. Higgins Rd.</b><br><b>Elk Grove Village, IL 60007</b>  | <b>400.00</b>                             | <b>1,012.46</b>             | <b>-0-</b>          | <b>1,412.46</b>                             |
| Nature of Debt (Purpose):<br><b>Copier rent &amp; supplies</b>  |   |                             |                     |   |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>SPRINT Communications Corp.</b><br><b>P. O. Box 974</b><br><b>Burlingame, CA 94010</b>     | <b>500.00</b>                             | <b>1,424.22</b>             | <b>970.86</b>       | <b>953.36</b>                               |
| Nature of Debt (Purpose):<br><b>Des Plaines office phone</b>  |   |                             |                     |   |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>United Envelope Corp.</b><br><b>1200 S. Sterling Blvd. #A</b><br><b>Sterling, VA 22170</b> | <b>-0-</b>                                | <b>1,531.45</b>             | <b>-0-</b>          | <b>1,531.45</b>                             |
| Nature of Debt (Purpose):<br><b>Printing</b>  |   |                             |                     |   |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>The Viguerie Company</b><br><b>7777 Leesburg Pike</b><br><b>Falls Church, VA 22043</b>     | <b>-0-</b>                                | <b>3,609.58</b>             | <b>2,000.00</b>     | <b>1,609.58</b>                             |
| Nature of Debt (Purpose):<br><b>Mailing service</b>   |   |                             |                     |   |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>United Air Lines</b><br><b>P. O. Box 66100</b><br><b>Chicago, IL 60666</b>                 | <b>11,079.97</b>                          | <b>-0-</b>                  | <b>-0-</b>          | <b>11,079.97</b>                            |
| Nature of Debt (Purpose):<br><b>Airplane travel</b>   |   |                             |                     |   |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>A. B. Data, Inc.</b><br><b>8050 N. Port Washington Rd.</b><br><b>Milwaukee, WI 53217</b>   | <b>10,000.00</b>                          | <b>53,800.00</b>            | <b>23,800.00</b>    | <b>40,000.00</b>                            |
| Nature of Debt (Purpose):<br><b>Mailing service</b>   |   |                             |                     |   |
| 1) SUBTOTALS This Period This Page (optional) . . . . .   |   |                             |                     | <b>\$56,586.82</b>                          |
| 2) TOTAL This Period (last page this line only) . . . . .   |   |                             |                     |   |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) . . . . .   |   |                             |                     |   |



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Name of Committee (In Full)

**CORCORAN FOR SENATE COMMITTEE**

03020042647

|  |   |                                    |   |
|--|---|------------------------------------|---|
| A. Full Name, Mailing Address and ZIP Code<br>Sigma Press<br>Rt. 23 & I-80<br>Ottawa, IL 61350                     | Purpose of Disbursement<br>Campaign Printing  | Date (month, day, year)<br>6-27-83 | Amount of Each Disbursement This Period<br>\$949.38   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| B. Full Name, Mailing Address and ZIP Code<br>Wolf C. Dietrich<br>6819 Harvest Ave.<br>Woodridge, IL 60517         | Purpose of Disbursement<br>Reimbursement for travel expense   | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$238.49   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| C. Full Name, Mailing Address and ZIP Code<br>Illinois Bell<br>225 W. Randolph<br>Chicago, IL 60606                | Purpose of Disbursement<br>Campaign Phone   | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$700.91   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| D. Full Name, Mailing Address and ZIP Code<br>Pitstick's Pavillion<br>Route 2<br>Ottawa, IL 61350                  | Purpose of Disbursement<br>Fundraiser Dinner  | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$437.33   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| E. Full Name, Mailing Address and ZIP Code<br>River St. Press<br>149 S. River<br>Aurora, IL 60506                  | Purpose of Disbursement<br>Campaign Printing  | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$543.34   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| F. Full Name, Mailing Address and ZIP Code<br>Advertising Specialities, Inc<br>331 E. Superior<br>Ottawa, IL 61350 | Purpose of Disbursement<br>Campaign Paraphernalia   | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$312.97   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| G. Full Name, Mailing Address and ZIP Code<br>U.S. Postmaster<br>Aurora, IL 60507.                                 | Purpose of Disbursement<br>Campaign Postage   | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$500.00   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| H. Full Name, Mailing Address and ZIP Code<br>Cedric Spring & Assoc.<br>113 E. Main St.<br>St. Charles, IL 60174   | Purpose of Disbursement<br>Campaign Paraphernalia   | Date (month, day, year)<br>6-30-83 | Amount of Each Disbursement This Period<br>\$419.10   |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| I. Full Name, Mailing Address and ZIP Code<br>A. B. DATA<br>8050 N. Port Washington Rd.<br>Milwaukee, WI 53217     | Purpose of Disbursement<br>Campaign Mailing   | Date (month, day, year)<br>6-17-83 | Amount of Each Disbursement This Period<br>\$2,000.00 |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                    |   |
| SUBTOTAL of Disbursements This Page (optional)   |   |                                    | \$6,101.52  |
| TOTAL This Period (last page this line number only)  |   |                                    |   |

# ITE. ZED DISBURSEMENTS

Page 1 of 17

LINE NUMBER 17  
 Attach schedule(s) for each  
 category of the Detailed  
 Summary Page)

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 purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Committee (in Full)

## FOR SENATE COMMITTEE

|  |   |                                       |   |
|--|---|---------------------------------------|---|
| Name, Mailing Address and ZIP Code<br>Port Washington<br>WI 53217                      | Purpose of Disbursement<br>mailing service  | Date (month,<br>day, year)<br>7-16-83 | Amount of Each<br>Disbursement This Period<br>\$6,000.00  |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Port Washington<br>WI 53217                      | Purpose of Disbursement<br>mailing service  | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$12,000.00 |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Port Washington<br>WI 53217                      | Purpose of Disbursement<br>mailing service  | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$646.72    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Holtman<br>Aurora, IL 60538                      | Purpose of Disbursement<br>Aurora Office rent   | Date (month,<br>day, year)<br>7-21-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Bell<br>Randolph<br>IL 60606                     | Purpose of Disbursement<br>WATS service   | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$240.61    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Bell<br>Randolph<br>IL 60606                     | Purpose of Disbursement<br>Aurora Office phone  | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,522.94  |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Fetrich<br>Aurora, IL 60517                      | Purpose of Disbursement<br>consultant fee   | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,875.00  |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Computer Center<br>Carolnway<br>Aurora, IL 60542 | Purpose of Disbursement<br>computer supplies  | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$346.48    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |
| Name, Mailing Address and ZIP Code<br>Sauci Dr.<br>IL 60506                            | Purpose of Disbursement<br>consultant fee   | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |
|  | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                                       |   |

Disbursements This Page (optional) ..... \$23,231.75

Disbursements (last page this line number only) .....

4—Section 1 Thursday, July 7, 1983 THE DAILY HERALD

# Corcoran calls Percy Israel's foe

WASHINGTON (AP) — Illinois Sen. Charles H. Percy is under attack as Israel's most powerful adversary in the Senate in an expanded replay of a political fund-raising drive that figured heavily in the defeat of Downstate Rep. Paul Findley last year.

"More than any other officeholder in Washington, Percy has worked to destroy the special relationship between the United States and Israel," says a letter sent to more than 50,000 Jewish campaign contributors nationwide on behalf of the senator's primary challenger, Rep. Tom Corcoran, R-Md.

It resembles fund-raising appeals that amassed thousands of dollars for U.S. Rep. Dick Durbin, D-Ill., who unseated Findley in 1982 after the GOP lawmaker's Mideast views angered Jewish contributors.

"THEY'RE REALLY SHARPENING the knives," Findley, now a Washington writer and lecturer, said after hearing of the attack on the Senate



Charles  
Percy



Tom  
Corcoran

Foreign Relations Committee chairman. "I hate to see Chuck Percy on the receiving end."

Corcoran's press secretary, Scott McMurray, said the 50,000 fund-raising packets, fashioned by direct mail expert Jerry Benjamin of Milwaukee, a Durbin consultant in 1982, were mailed

June 10 and have "exceeded expectations."

"You can tell by the fact that we're mailing more of them that we're making money," McMurray said of the letter signed by Northfield, Ill., businessman Louis A. Morgan, a leading Durbin fund-raiser who is now heading

Corcoran's drive in the Jewish community.

The two camps are at odds over specifics in the letter.

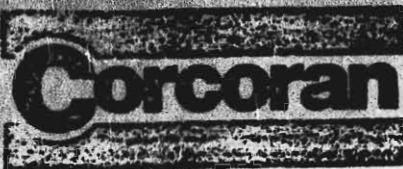
It says Percy "led the battle" in 1979 for Senate approval of a sale of F-16 fighters to Saudi Arabia and "followed up on that outrage" in 1981 when he "pushed through" the sale of AWACS radar planes to the Saudis.

PERCY BACKED BOTH plans, but Foreign Relations Committee staff director Scott Cohen, a Percy supporter, argues that "led the battle" goes too far and President Reagan "pushed through" the AWACS sale.

The letter says Percy "almost singlehandedly" blocked a shipment of F-16 warplanes to Israel last year. In fact, the Reagan Administration blocked the shipment when Israel went into Lebanon but has since released the planes, in both cases with Percy's support.

ATTACHMENT II

MUR 1684  
Brown



CORCORAN FOR SENATE COMMITTEE  
P. O. BOX 2667 • AURORA, ILLINOIS 60507

May 18, 1984

MAY 21 A10:25

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

Re: MUR 1684

Dear Mr. Steele:

3 5 0 4 0 5 1 1 4 8 4

This letter is written in response to your letter dated April 30, 1984 and the complaint filed by Senator Charles H. Percy ("Percy") and Citizens for Percy '84 ("Citizens") against, inter alia, the Corcoran for Senate Committee ("Committee"). 2 U.S.C. §437g(a). Percy and Citizens contend that the Committee violated the Federal Election Campaign Act of 1971, as amended, by cooperating and consulting with Michael Goland ("Goland") who made independent expenditures on behalf of the Committee. Percy and Citizens allege that Goland made the expenditures at the direction of Morris Amitay ("Amitay") who allegedly "was both an agent of and fundraiser for the Corcoran campaign" and "was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs." See Complaint at 2. Percy and Citizens acknowledge that their complaint is based upon their information and belief that such allegations are true and not upon documentary evidence or sworn statements. See Complaint at 1. Percy and Citizens also contend that the use of the same direct mail fundraising firm by Goland and the Committee mandates that Goland's expenditures are presumptively not independent.

I. Morris Amitay and Michael Goland were not agents or authorized fundraisers of the Committee.

In its regulations at 11 C.F.R. §109.1(a), the Federal Election Commission ("FEC") defines independent expenditure as:

an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.

Percy and Citizens contend that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay. The FEC defines agent at 11 C.F.R. §109.1(b)(5) as:

any person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures.

Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or the candidate, Thomas Corcoran. See Affidavit of Reed J. Wilson ("Wilson Affidavit") at 4. Amitay did not hold any position within the campaign organization. See Wilson Affidavit at 5. Likewise, Goland was not authorized to make expenditures on behalf of the campaign nor did he hold any position within the campaign organization. See Wilson Affidavit at 4-5.

Percy and Citizens further contend that Goland's independent expenditures were "made with the cooperation or with prior consent of, or in consultation with, or at the request of, a candidate or any agent or authorized committee of the candidate" because such expenditures were made through Amitay who was authorized to raise funds for the Committee. See 11 C.F.R. §§ 109.1(a)(4) and 109.1(a)(4)(i)(B). An expenditure is presumed to be made at the direction of the candidate if it is made through an authorized fundraiser. See 11 C.F.R. § 109.1(a)(4)(i)(B). Amitay was never authorized by the Committee to raise funds on its behalf. See Wilson Affidavit at 6. Likewise, Goland was not authorized to raise funds for the Committee. See Wilson Affidavit at 6.

Mr. Steele  
May 18, 1984  
Page Three

The Committee did not cooperate or consult with Goland nor did it participate in the making of Goland's independent expenditures. See Wilson Affidavit at 7. Also, neither Goland nor Amitay were agents or authorized fundraisers of the Committee. See Wilson Affidavit at 7. The Committee had no involvement in Goland's expenditures and asks the FEC to take no further action against it.

II. The Committee was not aware that Goland used the same direct mail consultant.

Percy and Citizens contend that the use of the same direct mail consultant, AB Data, Ltd. ("AB Data"), by Goland and the Committee gives rise to a presumption that Goland's expenditures were not independent. The Committee was not aware that Goland used the same direct mail consultant. See Wilson Affidavit at 9. As a result of the above-mentioned relationship of the Committee with AB Data and its lack of knowledge that Goland used the same firm, the FEC could not sustain a finding of coordination between Goland and the Committee through AB Data, see MUR 1252/1299, General Counsel's Brief at 39, and, therefore, the Committee asks the FEC to take no further action against it.

III. Conclusion

The Committee respectfully asks the FEC to find that no further action should be taken against the Committee on the basis of the complaint. The Committee's sworn testimony refutes the allegations based on information and belief of Percy and Citizens.

Respectfully submitted,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

BEFORE THE FEDERAL ELECTION  
COMMISSION OF THE UNITED STATES  
OF AMERICA

IN THE MATTER  
OF CORCORAN FOR  
SENATE COMMITTEE et al.

)  
)  
)

- MUR 1684

AFFIDAVIT

COUNTY OF LASALLE  
STATE OF ILLINOIS

)  
) ss:

Reed J. Wilson for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I was the campaign manager for Thomas J. Corcoran and his principal campaign committee, the Corcoran for Senate Committee ("Committee"), in Mr. Corcoran's campaign for the Republican nomination for the office of United States Senator from the State of Illinois.
3. I directed and supervised all aspects of the campaign and was aware of Mr. Corcoran's and the Committee's relationship with campaign employees, agents, fundraisers and consultants.
4. Neither Morris Amitay ("Amitay") nor Michael Goland ("Goland") had oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or Mr. Corcoran.

35040511487

5. Neither Amitay nor Goland held any position with the Corcoran campaign organization.

6. Neither Amitay nor Goland were authorized to raise funds for the Committee.

7. Neither Mr. Corcoran, the Committee nor any employees or agents of the Committee cooperated or consulted with Goland in the making of expenditures on behalf of the Committee.

8. AB Data, Ltd. ("AB Data") was retained by the Committee in January, 1983 to perform direct and voter contact mail services. These services included the obtaining of direct mail lists, the creation of fundraising copy and packages, the maintenance of contributor files, the production and mailing of fundraising packages, and the creation and production of voter contact mail to Republican households in selected counties within the state. The Committee did not ask AB Data to provide any services or consultation to the campaign beyond those listed above.

9. The Committee did not know until after the completion and mailing of the Goland direct mail program that Goland also used AB Data as a direct mail consultant.

Reed J. Wilson  
Reed J. Wilson

Subscribed and sworn to before me this 18th day of May, 1984.

Sharon DeCoursey  
Notary Public Sharon DeCoursey

35040511488

# MANATT, HELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

11355 WEST OLYMPIC BOULEVARD

LOS ANGELES, CA 90064

TELEPHONE (213) 312-4000

TELEX 218083

CABLE MANATOP LSA

FAX (213) 478-0888

June 5, 1984

CHARLES T. MANATT,  
THOMAS B. HELPS,  
ALAN L. ROTHENBERG,  
JOHN V. TUNNEY,  
L. LEE CHAMBERS,  
BARNETT STEINER,  
THOMAS D. BARNES,  
MICHAEL S. HARTER,  
LESLIE S. HARRIS,  
DAVID W. JACOBSON,  
JEROME H. GRACEY,  
ARNOLD R. SCHUSTER,  
RONALD J. SILVERMAN,  
GEORGE DAVID NEFFEN,  
GORDON H. BORN,  
ERIC E. STERN,  
RICHARD LEE AUGUST,  
ARTHUR S. GREENFIELD,  
THOMAS E. HOLLAND,  
JOHN C. STUART,  
DAVID J. HALL,  
DAVID D. HUNTER,  
DAVID S. JACOBSON,  
THOMAS E. POSERS, JR.,  
A. BARRY SCHUCHET,  
MARK JANE LARSEN,  
PETER T. PATERNI,  
DEAN L. PETERSEN,  
ROBERT T. SCHWARTZ,

LESLIE SPEIGHT,  
ROBERT L. BARNES,  
BARRY H. LAWRENCE,  
BENJAMIN TETTERMAN,  
KEITH T. HOLMES,  
TIMOTHY R. FURLONG,  
STEPHEN D. GREENBERG,  
WILLIAM S. BRUNSTEIN,  
DONALD J. FITZGERALD,  
STEVEN A. HIGGINS,  
LAWRENCE J. ULMAN,  
JOHN S. EMERSON,  
WILLIAM T. GUNDSINGER,  
STEVEN M. GOLDBERG,  
HAROLD B. BIRNBOIM,  
SHIRLEY M. R. BARNETT,  
LAWRENCE J. BARNES,  
DAVID R. HOLLAND,  
DAVID E. BOYLE,  
MATTHEW S. STEINBERG,  
DENNIS R. JOHNSTON,  
LAWRENCE M. MARSH,  
BARBARA J. SCHLIM,  
DEWEY E. LONG,  
KATHLEEN QUINN-NEVILLE,  
RICHARDSON SCHALL,  
ARNOLD E. TELLER,  
JANE L. ELLISON,  
LESLIE A. SMITH

JOHN B. COCHRANE,  
RICHARD A. FALK,  
BARBARA J. ZIMMERMAN,  
DAVID H. GRUMMEYER, JR.,  
EUGENE TAMARA,  
CAROL LAURENCE MARALL,  
JOSE E. GRAMANN,  
DAVID J. SIDON,  
DANIEL L. APPELMAN,  
ELEANOR WATSON,  
PHILIP R. RECHT,  
ROBERT LANE CARRICK,  
ROBERT S. BRUNER,  
CURT H. THOMPSON,  
HELEN L. DELANEY-MANANNI,  
STEVEN M. BARNES,  
MATTHEW R. BARNES,  
DAVID A. HARRIS,  
ROBERT DOUGLAS LEE,  
CHARLES M. SHUMAKER, II,  
TIMOTHY J. HOY,  
JONATHAN L. HIRSCH,  
TONY R. GRAMANN,  
BARRY BRADSHAW,  
HAROLD D. CASEY,  
CLARE BRONKHORST,  
ROSE D. ORS,  
JOHN M. ALDRICH,  
MICHAEL A. FRIESTEN

\*MEMBER OF DISTRICT OF COLUMBIA AND CALIFORNIA BARS  
\*MEMBER OF DISTRICT OF COLUMBIA BAR  
\*OTHER MEMBERS OF CALIFORNIA BAR  
\*A PROFESSIONAL CORPORATION

OF BARNES,  
LEE C. BARNES,  
WALTER R. HARRIS,  
ROBERT H. HARRIS,  
DAVID H. HARRIS

WASHINGTON, D.C. OFFICE

800 NEW HAMPSHIRE AVE., N.W.

WASHINGTON, D.C. 20008

202 463-4300

SAN FRANCISCO OFFICE

4 EMBARCADERO CENTER

SAN FRANCISCO, CALIFORNIA 94104

415 397-7540

LOS ANGELES (DOWNTOWN)

311 WEST SEVENTH STREET

LOS ANGELES, CALIFORNIA 90007

(213) 400-6500

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

Re: MUR 1684

Dear Mr. Steele:

This response to the above-referenced matter is submitted on behalf of Michael Goland and Morris J. Amitay.<sup>1/</sup> The complaint filed on April 26, 1984,<sup>2/</sup> by Senator Charles H. Percy and Citizens for Percy '84 alleges that independent expenditures made by Mr. Goland in opposition to Senator Percy were made in coordination and consultation with the campaign of Representative Thomas Corcoran, Senator Percy's

1/ Mr. Amitay should not be considered as a respondent in this MUR. Even if all of the allegations were correct, he violated no provision of the Act or regulations.

2/ This response was originally due on May 22, 1984. A 15-day extension was obtained and the response is now due on June 6, 1984.

35040511489

Charles N. Steele, Esq.  
June 5, 1984  
Page 2

opponent in the 1984 Illinois Republican primary. Complainant's contention that the expenditures should be treated not as the expression of Mr. Goland but rather as the campaign statements of Representative Corcoran is based solely on three factual allegations: 1) that Mr. Amitay was an agent of Representative Corcoran; 2) that Mr. Amitay controlled the expenditures of Mr. Goland; and 3) that Mr. Goland and Representative Corcoran used the same fundraising agent, A.B. Data.

For the following reasons set forth more fully below, these allegations are wholly without merit. First, Mr. Amitay was never an agent of the Corcoran campaign. He was not privy to Corcoran plans or strategies; in fact, he had minimal contact with Representative Corcoran and none whatsoever with individuals on his campaign. Second, Mr. Amitay did not direct or control the expenditures of Mr. Goland. The relationship between Mr. Amitay and Mr. Goland is primarily that of attorney and client.<sup>3/</sup> Finally, Mr. Goland did not use A.B. Data as a fundraising agent.

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<sup>3/</sup> Mr. Amitay has provided a range of services to Mr. Goland, including legal advice and consulting services commencing in 1982.

Charles N. Steele, Esq.  
June 5, 1984  
Page 3

Mr. Goland's activities were carefully conducted in accordance with the applicable legal standards governing independent expenditures. Complainants have failed to present credible evidence demonstrating any relationship between Mr. Goland and Mr. Amitay on one hand and the Corcoran campaign on the other.

For these reasons, the Commission should find no reason to believe that there was a violation of the Federal Election Campaign Act or of the Commission's regulations.

I. Independent Expenditures Are a Form of Constitutionally Protected Speech

The right of an individual to make independent expenditures from his own funds is a form of speech protected by the First Amendment. In Buckley v. Valeo, 424 U.S. 1 (1976), the Supreme Court held that governmental restrictions on such expenditures are subject to strict scrutiny. The Court stated:

[T]he independent expenditures ceiling . . . heavily burdens core First Amendment expression. For the First

35040511491

Charles N. Steele, Esq.  
June 5, 1984  
Page 4

Amendment right to "'speak one's mind  
. . . on all public institutions'"  
includes the right to engage in "'vigorous  
advocacy' no less than 'abstract discus-  
sion' . . . . Advocacy of the election or  
defeat of candidates for federal office  
is no less entitled to protection under  
the First Amendment than the discussion  
of political policy generally or advocacy  
of the passage or defeat of legislation.

424 U.S. at 42. (Citations omitted.)

In response to this articulation of the protected  
nature of independent expenditures, in 1976 Congress amended  
the Act and the Commission adopted regulations defining cir-  
cumstances under which expenditures are so closely linked to  
a candidate that they no longer enjoy the Constitutional  
protections of Buckley. Thus, under the FECA, an independent  
expenditure is defined as:

an expenditure by a person expressly  
advocating the election or defeat of a  
clearly identified candidate which is  
made without cooperation or consultation  
with any candidate or any authorized  
committee or agent of such candidate,  
and which is not made in concert with,  
or at the request or suggestion of, any  
candidate, or any authorized committee  
or agent of such candidate.

35040511492

Charles N. Steele, Esq.

June 5, 1984

Page 5

2 U.S.C. Section 431(17). The legislative history of the 1976 amendments states that:

The definition of the term "independent expenditure" in the conference substitute is intended to be consistent with the discussions of independent political expenditures which was included in Buckley v. Valeo.

Report of Committee of Conference on S. 3065, H.R. Rep. No. 94-1057, 94th Cong., 2nd Sess. 38 (1976).

Based on this statutory definition, the Commission in its regulations further defined the standard governing independent expenditures as, inter alia,

Any arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display, or broadcast of the communication. An expenditure will be presumed to be so made when it is

(A) Based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate, or by the candidate's agents, and with a view toward having an expenditure made;

(B) Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or

35040511493

Charles N. Steele, Esq.  
June 5, 1984  
Page 6

who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent.

11 C.F.R. Section 109.1(b)(4)(i).

35040511494

The Complaint argues that two of these criteria demonstrating coordination are present in this case -- (1) that the expenditures were made in cooperation with an agent of the candidate and (2) that the expenditures were made through a common fund-raising agent. Neither of these contentions are factually correct. In fact, Mr. Goland took great care to assure that his activities fell well within the scope of the core First Amendment expression the Supreme Court has deemed protected and that he did not engage in activities which the Commission has determined would suggest that his speech is sufficiently linked to a candidate's campaign to support a conclusion that it was coordinated with it.

II. The Expenditures by Mr. Goland Were Independent

Michael Goland determined to engage in public advocacy making known his views in opposition to the re-

Charles N. Steele, Esq.  
June 5, 1984  
Page 7

election of Senator Percy. To this end, he planned a series of independent expenditures through both media advertising and direct mailings. Mr. Goland properly reported all of his independent expenditures. The telegrams submitted in accordance with the reporting requirements of the Act reflect that he made expenditures totalling \$152,090 for radio and television ads opposing Senator Percy's re-election, and \$127,639.60 for mailings opposing his re-election. Exhibits 4, 4a, 10 and 10a to Complaint.

The initial idea as well as the decision to make the independent expenditures against Senator Percy during the Illinois Republican primary were solely those of Mr. Goland. (Statement of Michael Goland, Exhibit A). Mr. Goland made this decision based on his dissatisfaction with actions taken by Senator Percy as a U.S. Senator and as Chairman of the Senate Foreign Relations Committee. It is precisely these types of expenditures which the Court in Buckley, supra, sought to protect.

Mr. Goland was not concerned with who succeeded Senator Percy. Rather, his interest was limited to Senator Percy's defeat. To convey his message, Mr. Goland personally

Charles N. Steele, Esq.  
June 5, 1984  
Page 8

designed the format and content of the expenditures. He did not seek approval of the advertisements from Mr. Amitay or any other person. (Statement of Michael Goland, Exhibit A).

Mr. Amitay is an attorney in Washington who has advised Mr. Goland over a number of years -- commencing long prior to the independent expenditures made by Mr. Goland -- on a wide range of legal and business matters. When Mr. Goland was considering making the independent expenditures in question, he asked Mr. Amitay to advise him on FEC requirements applicable to independent expenditures, including reporting requirements. Mr. Amitay did, in fact, provide such advice. (Statements of Mr. Goland and Mr. Amitay, Exhibits A and B.)

The Complainants have attempted to distort this minor advisory role Mr. Amitay played in Mr. Goland's decision by suggesting that Mr. Amitay "controlled" Mr. Goland's expenditures. The only evidence in the complaint supporting this contention is a handwritten note by Mr. Amitay responding to an informal telephone request from the Republican Senatorial Campaign Committee to identify possible Republicans on the Washington PAC advisory board. Next to the circled

35040511496

Charles N. Steele, Esq.  
June 5, 1984  
Page 9

names on a sheet of Washington PAC letterhead, Mr. Amitay scribbled "no one makes a move without my o.k." Exhibit 8 to Complaint. In fact, Mr. Goland was no longer actually on the Board, since he had made no contributions since July of 1982.

Both the context and tone of the comment make it clear that it was offered in jest. Moreover, the note was not directed specifically to any particular one of the many names circled by Mr. Amitay. The note certainly had no connection to Mr. Goland's independent expenditures and provides no evidence whatsoever of control over any of Mr. Goland's political expenditures. It offers absolutely no proof of Complainant's broad assertion that Mr. Amitay directed Mr. Goland's expenditures in Illinois.

III. Mr. Amitay Was Not an Agent of the Corcoran Campaign.

The Complaint does not even suggest that Mr. Goland had any direct contact with Representative Corcoran or his campaign. Indeed, Mr. Goland has not had any contact with Representative Corcoran or his campaign. Since Mr. Goland

35040511497

Charles N. Steele, Esq.  
June 5, 1984  
Page 10

scrupulously abided by the provisions of the Act and the Commission's regulations on independent expenditures, the Complainants are reduced to grasping at some other possible basis for linking Mr. Goland's expenditures with the Corcoran campaign. Lacking any better pretext, Complainants have seized upon the two or three contacts among Mr. Goland's attorney, Mr. Amitay, and Rep. Corcoran as the basis for their allegation that Mr. Goland's expression should be treated as part of the Corcoran campaign.

Mr. Amitay is an attorney in Washington, D.C. -- with offices on Capitol Hill -- who has represented Mr. Goland in a number of legal and business matters. Mr. Amitay also is the treasurer of the Washington Political Action Committee ("Washington PAC") and a columnist who regularly reviews and comments on election contests. Samples of his columns and Washington PAC newsletters are attached. (Exhibits C & D.) It was in these two contexts that Mr. Amitay had his only tangible contacts with Rep. Corcoran. (Statement of Mr. Amitay, Exhibit B.) Mr. Amitay had no official or unofficial advisory position with the Corcoran campaign; he never raised funds for the Corcoran campaign, nor did he ever have

35040511498

Charles N. Steele, Esq.  
June 5, 1984  
Page 11

contact with anyone on the campaign other than Rep. Corcoran himself.

A. Washington PAC

In December, 1982, when Rep. Corcoran was considering whether or not to run for Senate, he contacted Amitay as Washington PAC's treasurer. On April 6, 1983, he attended a Washington PAC luncheon. These luncheons are held regularly and are attended frequently by candidates seeking contributions. Washington PAC contributed a total of \$5,000 in five separate contributions to the Corcoran campaign. As demonstrated by the attached list (Exhibit E), this is a common contribution pattern by Washington PAC to maximize contact with recipients of contributions. At least eight other candidates have been given identical amounts consistent with this pattern.

The appearance of Rep. Corcoran at the luncheon and the contributions by Washington PAC do not demonstrate that Mr. Amitay was an agent of the Corcoran campaign. On the contrary, it is clear that these contacts occurred solely because Rep. Corcoran, as is the case with more than one

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Charles N. Steele, Esq.  
June 5, 1984  
Page 12

hundred candidates, sought contributions during this election season from Washington PAC.<sup>4/</sup> Specifically, Mr. Amitay was the individual to contact for Washington PAC, since he is its only officer aside from its Board members. The logical extension of complainant's argument would be that a treasurer of any political committee would automatically become an agent of every candidate to whom the committee makes a contribution. Nothing in the statute, the Commission's regulations or other precedent would support that contention.

B. The Interview

Since June, 1982, Mr. Amitay has regularly published columns reviewing various election races. (Statement of Mr. Amitay, Exhibit B.) In the course of reviewing candidates and their records and through his regular attendance at fundraisers and events, Mr. Amitay meets with all of the candidates who seek support from Washington PAC. When Rep. Corcoran first sought PAC support for his campaign, Mr. Amitay was not familiar with his record or his views on issues of

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<sup>4/</sup> Correspondence from Mr. Amitay's files demonstrates that these contacts were in Mr. Amitay's capacity as treasurer of the PAC. (Exhibit F.) The reference in the second letter, to the best of Mr. Amitay's recollection, was to make arrangements for the interview.

Charles N. Steele, Esq.  
June 5, 1984  
Page 13

particular interest to the PAC or to Mr. Amitay's readers. To gain more understanding of Rep. Corcoran's positions and to allow Mr. Amitay to report on those positions in his column, Amitay conducted the interview attached to the complaint as Exhibit 5. The complaint alleged that this interview demonstrates that Mr. Amitay was an agent of the campaign. On the contrary, it confirms that Mr. Amitay's relationship to the Corcoran campaign was that of an outsider seeking information about the Corcoran candidacy rather than an agent guiding it. Subsequent use of portions of this interview, and a photograph taken at the time, in an insert in a fund-raising letter was done solely at the discretion of the Corcoran campaign, which correctly identified Amitay as a "syndicated columnist."

C. News Reports 5/

Other than possible casual encounters with Rep. Corcoran at social gatherings or on Capitol Hill, these are

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5/ Newspaper articles may serve as the basis of a complaint only if they meet the standards set forth in 11 C.F.R. Section 111.4. The retraction of the newspaper articles used as the basis for this complaint proves their inaccuracy. These articles may not, therefore, be considered as sufficient to sustain a complaint.

Charles N. Steele, Esq.  
June 5, 1984  
Page 14

35040511502

the only contacts between Mr. Amitay and Rep. Corcoran. The only other "evidence" in the complaint on this question consists of two news accounts, one describing Mr. Amitay as a fundraiser and advisor to the Corcoran campaign and the other as "supporting" Rep. Corcoran. (Statement of Mr. Amitay, Exhibit B.) The first account was inaccurate and was retracted prior to the filing of this complaint. (Statement of Mr. Amitay, Exhibit B.) The second referred to Mr. Amitay's "supporting" Corcoran -- and nothing else. News articles have been properly deemed by the Commission as having only limited probative value. These two isolated references (one of which was subsequently retracted as false) are worthless as evidence in this matter. If considered at all as probative of anything, the retracted article proves only the great care of both Mr. Goland and Mr. Amitay to avoid even the appearance of substantive contact with Rep. Corcoran.

IV. A.B. Data Was Not a Fundraising Agent for Goland

A.B. Data was not a fundraising agent within the meaning of 11 C.F.R. Section 109.1(b)(4) and (5).<sup>6/</sup> A fund-

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<sup>6/</sup> Only \$27,639.60 of Mr. Goland's expenditures were made through A.B. Data. Thus, the complaint's alleged "A.B. Data Connection" is applicable only to the expenditures related to these particular mailings.

Charles N. Steele, Esq.  
June 5, 1984  
Page 15

raising agent is an individual or firm which is retained to raise funds for a committee. A vendor from whom a mailing list is procured is not a fundraising agent.

As stated above, the content and timing of the mailings by Mr. Goland were conceived of and designed by him alone. He used A.B. Data's services only for its mailing list and for the actual mailing. See A.O. 1979-80 (situation 6). Mr. Goland consulted with Mr. Amitay on the choice of a direct mail house in order to reach the appropriate voters. Mr. Amitay recommended A.B. Data, which is widely recognized as possessing the best list to reach the voting population concerned with the issues addressed by Goland in this independent expenditure. (Statement of Mr. Amitay, Exhibit B). Mr. Goland knew the President of A.B. Data, Jerry Benjamin. (Statement of Mr. Benjamin, Exhibit G.) Contrary to the complaint's suggestion that A.B. Data was one of many possible mailing firms, it was the only available choice, based on past experience of Amitay and general knowledge, for the particular mailing.

A.B. Data could not possibly be deemed a fundraising agent for Mr. Goland, since its mailing on his behalf did

35040511503

Charles N. Steele, Esq.  
June 5, 1984  
Page 16

not raise any funds. In any event, the expenditures were entirely independent. The regulations merely create a presumption that expenditures made through a common fundraising agent are not independent. 11 C.F.R. Section 109.1(b)(4)(i). Since Goland designed his own ads, and since there was no coordination at A.B. Data of Goland's and Corcoran's expenditures (Statement of Mr. Benjamin, Exhibit G), this presumption would be rebutted even if A.B. Data were a fundraising agent.

Conclusion

The independent expenditures made by Mr. Goland satisfied all of the requirements of 11 C.F.R. Section 109. As set forth in this response and supporting exhibits, complainant has failed to establish any facts supporting a conclusion that these expenditures were made in cooperation, consultation or at the request or suggestion of the Corcoran campaign. For the foregoing reasons, the Commission should

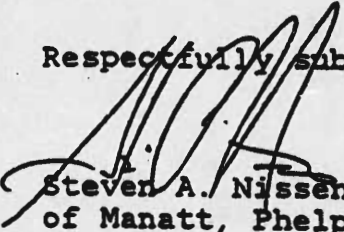
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MANATT, PHELPS, ROTHENBERG & TUNNEY

Charles N. Steele, Esq.  
June 5, 1984  
Page 17

find no reason to believe that a violation of the Act has  
occurred.

Respectfully submitted,

  
Steven A. Nissen  
of Manatt, Phelps,  
Rothenberg & Tunney

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35040511503

STATEMENT OF MICHAEL GOLAND

1. My name is Michael Goland. I reside at 10982 Roebling Avenue, Los Angeles, California 90024.

2. This statement is made in support of the response of Michael Goland and Morris Amitay to the complaint filed on April 26, 1984, by Senator Charles H. Percy and Citizens for Percy '84 (MUR 1684).

3. I have known Morris Amitay since 1981. He has given me legal and consulting advice on a variety of business matters during that time. At no time has he controlled or directed any political expenditure or contributions made by me.

4. Around June 1983, I contacted him for advice concerning proposed independent expenditures that I intended to make against Senator Charles H. Percy. He advised me concerning FEC requirements. At my request, he also advised me that A.B. Data provided the best mailing list to reach voters concerned with the issues which I wanted to address in my independent expenditures. I had known its president, Jerry Benjamin, prior to this time.

5. The idea and decision to make independent expenditures in opposition to Senator Percy in the Illinois Republican primary was entirely my own. I designed the content and timing of the advertisements on my own. I retained A.B. Data solely for its mailing list and mailing

services; at no time did A.B. Data serve as a fundraising agent for me.

6. I have never met or spoken with Representative Corcoran. I have not, to the best of my knowledge, had any contact with any representative of the Corcoran campaign.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.

Executed on this 5th day of June, 1984 at Los Angeles, California.

  
MICHAEL GOLAND

35040511507

STATEMENT OF MORRIS J. AMITAY

1. My name is Morris J. Amitay. I reside at 4712 Sunflower Drive, Rockville, Maryland, 20853. I am a member of the Bar of the District of Columbia.

2. This statement is made in support of the response of Michael Goland and Morris Amitay to the complaint filed on April 26, 1984, by Senator Charles H. Percy '84 and Citizens for Percy '84. (MUR 1684).

3. Since November 1980, I have served as treasurer of the Washington Political Action Committee ("Washington PAC"), a multi-candidate committee. Washington PAC makes contributions to a large number of federal candidates who support a credible U.S. defense and foreign policy.

4. I was contacted by Rep. Thomas Corcoran in December, 1982, in my capacity as treasurer of Washington PAC. Congressman Corcoran informed me he was considering running as a candidate for Senate in the 1984 Illinois Republican primary and requested assistance from the Washington PAC. On April 6, 1983, Representative Corcoran attended a Washington PAC luncheon. Candidates seeking contributions from Washington PAC frequently attend similar monthly luncheons to speak and meet with members of the advisory board of the PAC. Washington PAC made 5 contributions to Rep. Corcoran's campaign totalling \$5,000, the same practice used with at least eight other

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candidates. The letter of February 9, 1983, from Rep. Corcoran to me demonstrates that our contacts were in this context. (Exhibit F, page 1.)

5. In the past two years I have written bi-weekly columns reviewing election contests and other political events for various publications. I also edit the Washington PAC newsletter. Around March 1983, I interviewed Rep. Corcoran. Although I do not recall all of the details concerning the interview, to the best of my recollection, this interview was conducted in connection with my work as a columnist since I was not very familiar with Rep. Corcoran's policies or record. I wanted an opportunity to learn more about his record and stand on issues of concern to my readers. My letter of April 7, 1983 to Rep. Corcoran references, to the best of my recollection, my interest in arranging an appointment for the interview, and I had no knowledge of how and what portions of it would be used later. (Exhibit F, page 2.)

6. At no time have I been an agent, advisor or fund raiser for the Corcoran campaign. The news account attached to the complaint as Exhibit 6 merely states I was supporting him on the basis of our PAC's contributions. Exhibit 7, which described me as advising and fund raising, was erroneous and was retracted in a subsequent issue of the Baron Report before the complaint was filed. (Exhibit H)

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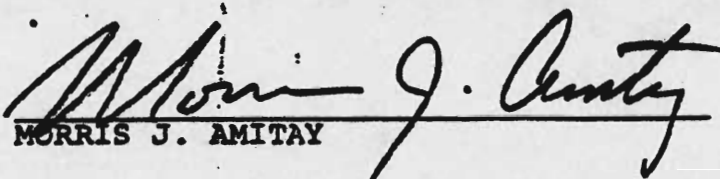
7. My relationship with Michael Goland is in a legal and consulting capacity and began long before any independent expenditures by him. Around June 1983, he contacted me concerning his intention to make independent expenditures against Sen. Charles H. Percy. I advised him concerning FEC requirements for independent expenditures and reporting requirements, emphasizing he must have no contact with any candidate's campaign. I did not suggest or request that Mr. Goland make any such expenditures, nor did I suggest the content of the advertisements run by Mr. Goland. Since I had no knowledge of the campaign plans or strategies of the Corcoran campaign, I could not and did not inform him of any such plans or strategies.

8. Mr. Goland sought my advice concerning the location of the best mailing list to reach voters concerned with the issues involved in his expenditures. I advised him that A.B. Data possessed the best list for this purpose. See Exhibit G, I.

9. Exhibit 8 to the Complaint does not demonstrate that I "controlled" Mr. Goland's expenditures. I had been contacted by someone from the Republican Senatorial Campaign Committee concerning the identities of Republicans on the Washington PAC board. I circled the name of a dozen individuals on the letterhead and forwarded it with a handwritten note with an obviously facetious comment, with no particular significance, as to "controlling" these individuals' political

expenditures. Mr. Goland, in fact, was no longer officially on the Board at the time since he had not made a contribution to the PAC since July of 1982.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.

  
MORRIS J. AMITAY

Executed on  
June 6, 1984.

## Report From Washington

By Morris J. Amitay

With less than four months to go before the November federal elections, it is important to remember that support for Israel in the U.S. Congress will remain a crucial factor in American foreign policy in the Middle East and in sustaining diplomatic and economic support for Israel. That is why it is vital to know where the candidates stand on the issues, what their prospects are — and to act accordingly. We will cover all of the 33 Senate races and some of the key House races starting with the Senate alphabetically by state. Future columns will be devoted to the rest of the Senate, and selected House of Representatives elections. Active involvement in the political process of our country should be a vital function of the American Jewish community.

### Arizona

First term Senator Dennis DeConcini (D), who faces a potentially difficult reelection effort, holds an important position on the

Foreign Operations Subcommittee which has oversight on the foreign aid appropriations bill. DeConcini has opposed sophisticated arms sales to Israel's foes and is in favor of strong U.S. — Israel relations. Little is known of DeConcini's possible Republican challengers in terms of their positions vis-a-vis the Middle East.

### California

Neither Republican Mayor of San Diego, Pete Wilson, nor Democratic Governor Jerry Brown, who are vying to succeed retiring Senator S.I. Hayakawa, have Congressional voting records on Middle East issues. Public statements, however, give an indication as to future positions. Throughout his career, Jerry Brown has expressed strong support for close U.S. — Israel ties. Most recently, he reaffirmed his opposition to sales of advanced arms to Jordan and Saudi Arabia. While Wilson has also voiced support for Israel in

his campaign, he gave public support to the sale of AWACS and F-15 enhancement equipment to Saudi Arabia. The early lead is clearly held by Wilson, but political pros expect a strong effort by Brown, and this race will probably be very close.

### Connecticut

The Connecticut Senate race is shaping up as one of the most crucial races nationwide. Incumbent Republican Senator Lowell Weicker is running for a third term and is drawing challenges from within his own party and the Democratic party. Weicker, who has had a consistent and outspoken record of strong support for Israel, is being challenged by Prescott Bush, brother of V.P. George Bush, for the GOP nomination, and by Rep. Toby Moffett (D) in the general election. Despite recent good public statements, Moffett is remembered for his 1980 meeting with Yasir Arafat, his mixed record on foreign aid, and particularly his vote (one of only 37) in favor of a \$200 million cut in aid to Israel in 1976. In a late June poll by a Hartford TV station, Weicker and Bush came out even in a GOP primary, and Weicker led Moffett narrowly in a general election matchup. Moffett easily beat Bush in a two way race. These results buoyed the Weicker camp as they pushed toward the July 23 GOP convention, where Bush will have to receive 20% to gain a place on the September primary ballot.

### Delaware

Incumbent Republican Senator William Roth is running for a third term and is favored to retain his seat

over Jewish Democratic challenger David Levinson, a local real estate developer and ADL activist. Roth has both voted against the F-15 to Saudi Arabia in 1976 and was one of only five incumbent Republicans running who voted against the AWACS. The state of the economy could significantly affect this race, although Levinson must campaign non-stop until November to overcome his low name recognition. Roth is favored.

### Florida

Democratic Senator Lawton Chiles is a good bet to retain his Senate seat for a third term, as the GOP has failed to muster a strong candidate to challenge him. A strong supporter of Israel over the years and a member of the Appropriations Committee, Chiles should be able to beat any of the three Republican candidates who will be facing each other in the September primary.

### Hawaii

First term Democratic Senator Spark Matsunaga, has fended off any primary challenge in this fairly Democratic state and is not expected to face a strong contender in the November general election. Matsunaga has been a strong and consistent supporter of Israel and has the backing of Hawaii's small but active Jewish community.

### Indiana

Incumbent Republican Senator Richard Lugar, a member of the Senate Foreign Relations Committee, is facing his first reelection fight against a strong Democratic opponent, Representative Floyd Fithian. Fithian decided to challenge Lugar on the

basis of the Reagan economic program's impact on Indians. While generally supportive of foreign aid legislation, on the two major controversial issues of sales of sophisticated weapons to Saudi Arabia, Lugar supported the sales both in the Foreign Relations Committee and on the Senate floor. Fithian, who has a mixed record on foreign aid, voted against the sale of AWACS and F-15 enhancement equipment last year in the House, and was active in his opposition. At this time Lugar is the clear favorite, but Fithian cannot be ruled out of the race.

### Maine

In Maine, Democratic George Mitchell, who was appointed to fill out Muskie's unexpired term, is being challenged by Republican Representative David Emery, a four term Congressman. Mitchell, who is of Lebanese-American extraction, has been very supportive of strong U.S. — Israel relations in his two years in the Senate. He actively opposed the sale of AWACS and F-15 enhancement equipment to Saudi Arabia and voted in favor of foreign aid legislation or so any other initiative favorable to Israel. Early in the race, Emery was the heavy favorite to easily defeat Mitchell. Recently, however, Mitchell has come on much stronger and the race is now considered dead even.



# report from Washington

BY MORRIE AMITAY

This column will present information, and analyses of events here in Washington which should be of interest to American Jews. I hope it will not only inform its leaders, but stimulate them to greater community and political involvement. We hope the only bias shown is in favor of a more involved Jewish community and a strong secure Israel. After all, one supports the other.

difficult races. These include Dennis DeConcini of Arizona, Don Riegle of Michigan, George Mitchell of Maine, Jim Sasser of Tennessee and Paul Sarbanes of Maryland (who serves on the Foreign Relations Committee). On the Republican side, with only 12 incumbent seats at stake, interest is focused on such friends as John Heinz of Pennsylvania

and John Danforth of Missouri, who appear to be shoe-ins at this point. Senators David Durenberger of Minnesota and Lowell Weicker of Connecticut who have tougher races. Weicker, who has been an outspoken supporter of Israel, first faces a challenge in the Republican primary

from Prescott Bush, brother of the Vice-President and then a Democratic foe in November. As the November elections draw nearer we will provide more detailed information on these and other Senate races — as well as key House contests.

When journalist Steve Isaacs wrote his "Jews and American Politics" in the early 1970's there were two Jewish Senators and eleven House members. Today, in the 97th Congress there are six Jewish Senators and twenty-seven House members. These statistics — plus the large number of Jewish candidates from every region in the country now running for Congress — disprove the thesis that American Jews prefer to work behind the scenes in politics and shun running for

elective office. But religious affiliation is no absolute guarantee of taking positions favored by the majority of the American Jewish community. Not all Jewish legislators vote for the foreign aid bills containing vital funds for Israel — and in two of the most dramatic Senate votes in recent years — the original sale of F-15 fighter-bombers to Saudi Arabia, and the more recent enhancement package including the AWACS, ex-senator Abe Ribicoff of Connecticut in 1978, and senators Ed Zorinsky of Nebraska and Warren Rudman of New Hampshire in October, 1981 voted with the Administration — to the disappointment of many of us.

After not quite being sure of how and with whom to structure its relationships with the Jewish community, the Reagan White House has finally made two important appointments. Coming to Washington periodically on

a volunteer basis will be Los Angeles attorney Al Spiegel. Spiegel has both impeccable Jewish and Republican credentials and was asked personally by the President to assume the task. Active in the L.A. Federation and on the national Jewish scene, Spiegel was a Reagan delegate to the Nominating Convention back in 1976. To assist him on a full-time basis will be AIPAC's Mike

Gale, who will work out of the White House Office of Public Liaison, headed by Elizabeth Dole (Kansas Senator Bob Dole's wife). Spiegel and Gale have a difficult task to improve relations and ease mutual distrust between the White House and the American Jewish community — and we should all wish them well in what some feel might be a

In the 1980 Congressional elections such staunch supporters of Israel in the U.S. Senate as Jack Javits of New York, Frank Church of Idaho, Birch Bayh of Indiana, Dick Stone of Florida and John Durkin of New Hampshire were defeated in their reelection bids. The loss of these Senators on key committees has been incalculable. Javits, in the Republican-controlled Senate would have been Chairman of the Foreign Relations Committee (instead of Charles Percy) — and Church, its former Chairman, the ranking Democrat. Bayh and Durkin were on the Appropriations Committee, and Stone, Chairman of the Middle East Subcommittee.

This year a large number of pro-Israel stalwarts must face the voters in November. Such well-known democrats as Scoop Jackson of Washington State, Pat Moynihan of New York, Ted Kennedy of Massachusetts and Howard Metzenbaum of Ohio are up, and their reelection prospects look good at this point. But a cluster of lesser-known, but strong supporters face more

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# Watt's 'Favor' to Israel

Two changes of key players in the Middle East picture could benefit closer U.S.-Israeli ties. Yitzhak Shamir's low-key style and cautious approach should present less of a target for Israel's detractors than his predecessor, Menachem Begin. Also, his reliance on the astute and popular Defense Minister Moshe Arens should also promote greater cooperation with the United States. However, it is the prospect of a new National Security Advisor to President Reagan that could turn out to be a significant plus.

James Watt, by resigning, has in effect made a contribution to better relations between the United States and Israel. Simply stated, Bill Clark was no great friend of Israel. Clark, with his longstanding association with the President, operated in tandem with Caspar Weinberger. This duo constituted a strong influence consistently seeking closer ties to Arab foes of Israel. At this writing, it is not known who will replace Clark, but either of the two people mentioned, Jean Kirkpatrick or Bud McFarlane, would constitute a definite improvement. (Editor's note: It was McFarlane).

We wish the new Interior Secretary well in his new tasks, and hope that his successor will better appreciate Israel's strategic value and reliability.

□ □ □

There have been developments in a number of key Congressional races worth noting. In Minnesota, Rudy Boschwitz, the vital Chairman of the Near East Subcommittee still has reason to fear a strong challenge. Congressman James Oberstar is reported to be encouraged by his testing of the waters and will probably announce his intention to challenge Boschwitz by Thanksgiving. Additionally, Skip Humphrey, Hubert's son, is considering the race. The Berlin-born Boschwitz, whose family left Germany after the Nazis came to power has been one of Israel's staunchest supporters.

Despite GOP difficulties in finding dynamic candidates, Senator Carl Levin, who serves on the Armed Services Committee, is far from safe. An aggressive well-financed GOP challenger could create serious problems for this first term Jewish Senator who has been an outspoken and effective supporter.

Although Senator Charles Percy of Illinois was recently quoted at a Saudi Arabian Embassy party as saying he was not losing any sleep over his reelection possibilities, the Chairman of the Foreign Relations Committee is bound to have some sleepless nights between now and election day. Democratic State Party Chairman, Phil Rock, launched his campaign last month, joining Rep. Paul Simon, Alex Seith and Roland Burris as the announced Democratic candidates. Analysts and polls give Rep. Paul Simon of downstate Illinois an edge in the Democratic primary contest on March 20th. Also, the polls show that Simon by far has the best chance of defeating Percy in the general election. First, Percy will have to fend off a serious Republican primary challenge from Rep. Tom Corcoran. Percy's recent

attempts to portray himself as a friend of Israel will probably not deceive the important Jewish community in Illinois who heard the same tune in 1978.

In Iowa, the latest newspaper polls show Democratic challenger Rep. Tom Harkin with a slight lead over Senator Roger Jepsen. Jepsen, one of the more conservative members of the Senate, is in a classic ideological match against one of the more liberal members of the House. This race should be one of the closest in the country. Harkin, who recently returned from a visit to Israel, is seeking Jewish support. Jepsen's flip-flop on the AWACs issues gained him notoriety in the Jewish community, even though Jepsen has tried to be supportive on a number of other Israel-related issues.

The Senate race in North Carolina will be a highly visible campaign. Senator Jesse Helms, an outspoken critic of Israel on the Foreign Relations Committee has already raised 1.7 million dollars and for several months has been attacking his likely opponent Gov. Jim Hunt with a barrage of radio and newspaper ads. Although the latest polls continue to give Hunt sizeable leads, it is far too early to make predictions. Hunt is considered friendly on Israel-related issues and is in an excellent position to replace Helms.

In Rhode Island, the ranking Democrat on the Foreign Relations Committee could be facing serious problems as Republican Rep. Claudine Schneider is actively considering a challenge. Recent polls show that Schneider leads Pell in a head-to-head contest and buoyed by these results, GOP leaders are urging her to run. Schneider has been supportive, as has been Senator Pell, who would become Chairman of the Foreign Relations Committee if the Democrats regain control of the Senate.

For some months now, political observers have been awaiting the decision of the Chairman of the Senate Appropriations Committee, Oregon's Senator Mark Hatfield, as to whether or not he will seek another term next November. At this late date, most think Hatfield will try again. If so, this long-time critic of Israel should be safe for yet another term.

Senator John Tower's unexpected announcement that he would retire at the end of his fourth term in the Senate has thrown the Texas race wide open. A number of Republican candidates have already thrown their hats into the ring, and many more are contemplating joining. For the moment, recently turned Republican Rep. Phil Gramm is gaining major financial support. Gramm has a very poor record of support on Israel-related issues, and was one of few House Democrats to support the Saudi AWACs sale. The Democrats have a number of challengers seeking the open Senate seat. Two middle-of-the-road Democrats, Rep. Kent Hance and Bob Kruegar, a former member of Congress and narrow loser to Tower in 1978, are running. Kruegar has a fine record of support, while Hance has a profile equally as poor as Phil Gramm's. With two more conservative Democratic candidates in the race, liberal State Senator, Lloyd Doggett's chances appear considerably improved.

Morris J. Amitsy



## Commentary

Morris Amltay

### Loss of Senator Jackson

The untimely and tragic passing of Sen. Henry M. "Scoop" Jackson was undoubtedly a great loss to the nation. But his steady support and contributions to Israel's security for

more than a decade were even more significant to the well-being of that small embattled country.



I had the unique opportunity to work closely with Scoop and his Morris Amltay talented staff, namely Dorothy Fosdick and Richard Perle since early 1970 as a Senate staffer for five years — and later as head of the American Israel Public Affairs Committee.

I was able to witness the development of his personal and professional relationship with then Israel's Ambassador, and later Prime Minister Yitzhak Rabin, and Rabin's brilliant political counselor, Amos Eiran. This close friendship endured until the day Scoop died and formed the basis for Scoop's leadership in the Senate on issues affecting Israel.

It was a natural relationship. Jackson, who served in the House of Representatives during WWII, believed that in dealing with unscrupulous enemies, military strength — and the willingness to use it — was essential. Rabin, as Chief of Staff during the Six-day War, embodied daring and courage in defeating superior Soviet-backed forces. Both were geopoliticians in the best sense of the word — understanding that the world was a dangerous place for democratic societies — and both were able to analyze and articulate relationships between nations with unusual perception.

From this mutual admiration came the first Jackson Amendment authorizing military sales credits for

Israel in 1971. It should be recalled that until that time, Israel received no military assistance of this kind from the US. But beyond the legal authorization, the Amendment, bitterly opposed by arch-foe of Israel, Foreign Relations Chairman William Fulbright, was a resounding statement by the Congress that the United States would provide direct military assistance to Israel.

During that period also, Jackson visited Israel and correctly predicted that the Soviet SAM missiles being installed near the Suez Canal would pose a grave threat to Israel's air operations in a future conflict. His warning — unheeded by the US Government which dismissed Israel's protests — unfortunately was borne out during the Yom Kippur War.

In the public mind, however, Jackson was identified more closely with his Freedom of Emigration Amendment. The Jackson-Vanik Amendment undoubtedly brought freedom to thousands of Soviet Jews who otherwise would still be in Russia. Ironically, the threat of the legislation, coinciding with Soviet expectations of great trade with the United States, produced greater re-

sults than the law itself.

But it was not easy convincing both Houses of Congress to pass this landmark legislation — especially while fighting a hostile Administration whose opposition was quarter-backed by the formidable Henry Kissinger. As one who negotiated the actual language of the Amendment and was present during the Jackson-Kissinger encounters, I can vouch for Jackson's cool resolve and steadfastness throughout. This, at times, in the face of wavering Congressional colleagues, and even Jewish leadership too eager to compromise. But Jackson prevailed — and Congress for the first time asserted itself in significantly affecting foreign policy.

Supporters of Israel throughout the world have cause to deeply mourn Jackson's untimely death. He set an example of conviction and action on behalf of Israel as being in the best interest of the US that will be difficult to duplicate.

In Washington on Oct. 4, there will be a special Jewish memorial service for Scoop Jackson. It will be an opportunity to express not only grief, but gratitude for a dear friend who will be sorely missed.

### Referendum

The California Supreme Court ruled that a specially scheduled Dec. 13 referendum on a Republican drawn reapportionment plan (the "Sebastiani" plan) was unconstitutional. This initiative, which Republicans backed in a move to regain political dominance, would have seriously affected the reelection of several outstanding pro-Israel Representatives including the veteran Henry Waxman, and key House Foreign Affairs Committee member Mel Levine and Howard Berman. Consequently, the Court's ruling should effectively preserve the reelection hopes of several key Congressional Israel supporters in the 1984 elections.

On a negative note, observers here who have been monitoring former Rep. Paul Findley's political activities now predict he may very well try to regain his House seat. Findley, who was a pro-PLO spokesman of the Foreign Affairs Committee, was narrowly defeated by Democrat Dan Durbin in 1982. A re-match would undoubtedly and deservedly attract the attention of the American Jewish community.

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## 16 REPORT FROM WASHINGTON

## A Run-Down on Congressional Election

BY MORRIS J. AMITAY

*We are continuing our summaries of the U.S. Senate races in the November elections.*

## MARYLAND

The reelection campaign of Democratic SENATOR PAUL SARBANES is one race of unusual importance. Sarbanes is an important and influential member of the Senate Foreign Relations Committee and its Subcommittee on Near East. After the

loss in 1980 of three friends from the Committee, Church, Javits, and Stone, the Sarbanes race emerges as a high priority. The major GOP challenger in the September primary is former U.S. REP. LARRY HOGAN. Judging from Hogan's record in the House, he is not expected to be particularly favorable. The Sarbanes race has been targeted by many national conservative groups, who will pour a lot of money into Maryland to defeat Sarbanes. Hogan is expected to wage a vigorous campaign, but Sarbanes is the favorite.

## MASSACHUSETTS

SENATOR EDWARD KENNEDY is running for reelection to a fourth term in the Senate. While his victory is not in doubt, Kennedy will put a great deal of effort into the campaign to enhance his status as a contender for the 1984 Democratic Presidential nomination. A long-term supporter of Israel, Kennedy has been very active in the last few years opposing arms sales to Israel's foes and supporting a strong U.S.-Israel relationship. Kennedy is challenged by Republican businessman-inventor RAYMOND SHAMIE. In his last Senate race Kennedy won with 70% of the vote, and political analysts will be looking at the size of his margin on election night.

## MICHIGAN

Incumbent Democratic SENATOR DON RIEGLE was thought to have a serious reelection problem at this time last year. The changing economic situation in Michigan and the failure of popular Republican Governor William Milliken to enter the race have combined to make reelection much more likely for Riegle. The GOP frontrunner is former U.S. REP. PHIL RUPPE, who did not distinguish himself as a particular friend of Israel. Riegle, on the other hand, has built a record of strong support for a close U.S.-Israel partnership with vocal opposition to arms sales to Israel's foes and support for U.S. foreign aid to Israel. While the Michigan race is far from over, most analysts believe that Riegle will win.

## MINNESOTA

Incumbent Republican SENATOR DAVID DURENBERGER is running for reelection after filling the unexpired term of the late Hubert Humphrey for the past four years. The September 14 Democratic primary will most likely see department store heir MARK DAYTON emerge as the challenger. Durenberger has built a solid record of support for legislation favorable to closer U.S.-Israel ties and actively opposed the F-15 enhancement package to Saudi Ara-

bia. Durenberger is considered a "contender" in GOP circles and holds a commanding lead at this time in the polls. However, the race is expected to tighten up.

## MISSISSIPPI

In a state where political analysts have tended to concede the Senate election to twenty-five year Democratic veteran SENATOR JOHN STENNIS, a new GOP candidate, HALEY BARBOUR, Vice-Chairman of the Mississippi GOP, is raising significant funds for his campaign and has sought to build a relationship with Mississippi's small but active Jewish community. Stennis has always gone down the line with the incumbent Administration on Middle East policy, and has not been accessible. Stennis' age and Republican inroads in Mississippi could make this an interesting race.

## MISSOURI

First term Republican SENATOR JOHN DANFORTH is running for reelection. He is a heavy favorite in this generally Democratic state. He has an outstanding record on issues of concern to the American Jewish community, with the exception of a vote in favor of the 1978 sale of F-15s to Saudi Arabia, which he has described as the toughest vote. In 1981 Danforth reversed himself and strongly opposed the sale of AWACS and F-15 enhancement equipment to the Saudis. As of now, there are eleven Democrats entered in the August 3 primary, with Jewish STATE SENATOR HARRIET WOODS emerging as the frontrunner.

## CAMPAIGN '82

MORRIS J. AMITAY, a former executive director of the American-Israel Public Affairs Committee (AIPAC) and legislative aide in Congress, is currently practicing law and lobbying in Washington with offices on Capitol Hill.

EXHIBIT C  
PAGE 7

MONTANA

Incumbent Democratic SENATOR JOHN MELCHER is running for a second term against Republican LARRY WILLIAMS, an investment counselor. Williams narrowly lost to Senator Max Baucus in 1978 and has the personal finances to make this a close race. Melcher has not distinguished himself as a particularly strong supporter of Israel, although in 1978 he did vote against the sale of F-15s to Saudi Arabia. Since then, he has not voted for foreign aid legislation and in 1978 voted in favor of the AWACS. There is no reason to believe Williams' record would be any better.

NEBRASKA

First term Jewish SENATOR ED ZORINSKY (D) is running for reelection in Nebraska. A member of the Senate Foreign Relations Committee, Zorinsky is being challenged by former Vice Commander of the Strategic Air Command JAMES KECK (R). Zorinsky is one of the two Jewish Senators who voted in favor of the sale of AWACS and F-15 enhancement equipment to Saudi Arabia. In Zorinsky's case, it was especially odd after his vote against the sale in the Senate Foreign Relations Committee before the floor vote. Last fall, Keck also announced his support for the AWACS sale, but he has indicated he would vote for foreign aid. Zorinsky has consistently voted against foreign aid. Zorinsky is clearly ahead at this point.

# WASHINGTON POLITICAL ACTION COMMITTEE

400 North Capitol Street, N.W., Suite 169, Washington, D.C. 20001 • 202/347-6613

No. 14

October, 1983

## SENATE UPDATE

Since our last Newsletter during the summer, new polls and unexpected events have taken place that could dramatically alter the outcome of the 1984 Congressional elections as they affect U.S. - Israel relations.

Last month's announcement by the Republican Chairman of the Armed Services Committee, Sen. John Tower of Texas, that he would not seek reelection next November, coupled with Majority Leader Baker's announcement earlier this year that he, too, would retire, has made a Democratic takeover of the Senate in 1984 a real possibility. More importantly, it removes two powerful Senators who were not particularly helpful on Israel-related issues. However, the untimely death of Sen. Henry Jackson, one of Israel's staunchest supporters, did more than offset these gains. Jackson's death also gave the GOP an unexpected boost with the appointment of ex-Republican Governor Dan Evans to the vacant seat (see Special Election Update). Nevertheless, Democratic party strategists remain encouraged with their '84 prospects. With a number of important races shaping up, Israel's supporters will have a key role to play in electing Democratic and Republican candidates in support of Israel. An asterisk indicates PAC support.

## KEY RACES

\*RUDY BOSCHWITZ (R-MN) - Although the latest FEC Report shows Boschwitz has accumulated a sizeable war chest of over one million dollars, this vital Chairman of the Near East Subcommittee still has reason to fear a strong challenge. Congressman James Oberstar (D) is reported to be encouraged by his testing of the waters and will probably announce his intention to challenge Boschwitz by Thanksgiving. Additionally, the popular Secretary of State, Joan Grove, also a credible candidate, is still considering a race as is the Attorney General, Skip Humphrey, Hubert's son. And, regardless of the Democratic nominee, a possible Mondale Presidential candidacy may effect Boschwitz's reelection hopes if more Democratic voters come to the polls in support of favorite-son Mondale.

\*CARL LEVIN (D-MI) - Possible GOP challengers abound, but former Representative Jim Dunn is, to date, the only announced candidate. Dunn's major primary rival is expected to be Loret Ruppe, the former Peace Corps Director, who Dunn currently leads in state-wide polling. Also interested is State GOP Vice Chair, Jaqueline McGregor. Despite GOP difficulties in finding a dynamic candidate, Levin, who serves on the Armed Services Committee, is far from safe; and an aggressive well-financed GOP challenger could create serious problems.

KEY  
HOUSE RACE

\*CLARENCE LONG (D-MD) - As Chairman of the vital House Appropriations Subcommittee on Foreign Operations which sets Israel's foreign aid levels, "Doc" Long has built a solid and longstanding record of support. This year, after winning by only 9000 votes in '82, the 74-year old Long is in the political battle of his life. Although no opponents have yet emerged, early support is crucial, and could mean the difference in Long's successful reelection.

SPECIAL ELECTION UPDATE

A Special Election to fill the seat vacated by the unexpected death of Henry "Scoop" Jackson, one of Israel's most supportive friends in Congress will be held November 8th. In the meantime, no fewer than thirty-four Democrat and Republican candidates have filed for their respective parties' primaries to take place on October 11. Former Republican Governor Dan Evans, who has been appointed to occupy the seat, is the clear favorite to capture the Republican primary as well as the general election.

Although Evans has had no occasion to vote on Israel-related issues he considers himself a friend and is reported to have a good relationship with his Jewish constituency. Evans could still face a credible challenge from favored Democratic candidates Seattle Mayor Charles Royer or Rep. Mike Lowry. The latter is in the unique position of making a Senate run without vacating the House seat he now holds. After serving two terms in Congress, Lowry has compiled a good record on foreign aid, but did not vote on the AWACS sale and has not signed the Jordan Arms Letter.

POLITICAL NOTES - Morrie Amitay

Having admitted publicly that his commitment to Israel has been suspect among pro-Israel supporters, Senator John Glenn, in a major foreign policy address before the Foreign Policy Association in New York City, delivered his most positive speech to date.

Glenn, who received much media publicity for his new approach, denounced the PLO as a "gang of terrorist thugs" and declared that the U.S. should not recognize or negotiate with them.

Additionally, Glenn stated that the U.S. should cease promoting an "evenhanded" approach in the Middle East, and instead give Israel full commitment and support. For these remarks, Glenn deserves praise. But given his turnaround from previous positions and actions, many wonder whether the conversion is genuine or a product of his political and financial advisors' pleas.

One speech does not constitute a policy -- or a record. It is important, then, to carefully analyze Glenn's recent remarks within the context of his past statements and actions, as well as those issues he avoided. Only then, can one determine if Glenn is really the candidate with the "right stuff" as far as Israel's friends are concerned.

Former Vice President Walter Mondale also addressed a New York audience recently, in which he reaffirmed his longstanding belief in a close U.S. - Israel relationship. Mondale's remarks, particularly his unequivocal statement that as President he would move the U.S. Embassy to Jerusalem without preconditions, went little noticed. Obviously the media did not consider it news for Mondale to express pro-Israel positions, while Glenn's doing so was news.

While enunciating his support for Israel, premised on strategic, moral and historical grounds, Mondale also flatly stated he did not regard Israel's settlements as "illegal". In handling a series of questions from an audience of top Jewish leadership, Mondale demonstrated a firm grasp of complex Middle East issues and personal familiarity with all the key players.

5 The Glenn and Mondale speeches were aimed at a vitally important New York electorate. Although New York will have a relatively "late" primary, it is shaping up as the pivotal state in the race ~~for~~ the Democratic nomination where the Jewish community will have a lot to say as to who might be the next President of the United States.

35040

ADVISORY BOARD  
PAC LUNCHEON SPEAKERS - 1983

|           |  |
|-----------|--|
| January   | Sen. Carl Levin (D-MI)<br>Sen. Rudy Boschwitz (R-MN)   |
| March     | Sen. Larry Pressler (R-SD)   |
| April     | Sen. Joseph Biden (D-DE)<br>Rep. Tom Corcoran (R-IL) (running against Percy)                           |
| May       | Sen. Howell Heflin (D-AK)<br>Rep. Clarence Long (D-MD)   |
| June      | Rep. Al Gore, Jr. (D-TN) (running for Baker's seat)<br>Rep. Tom Harkin (D-IA) (running against Jepsen) |
| July      | Sen. David Pryor (D-AR)  |
| September | Sen. Max Baucus (D-MT)   |

1984 SENATE RACES UPDATE

\***HOWELL HEFLIN (D-AL)** - Still considered to be one of the safest incumbent Democrats up for reelection, Heflin should have only minor opposition next November. The only announced Republican candidate is a neurosurgeon from Montgomery, which prompted a paper to suggest that it "is not inappropriate considering that the Senate frequently shows evidence of nerve impairment." Heflin has been an unusually strong Southern supporter on Israel-related issues and has received maximum PAC support.

**TED STEVENS (R-AK)** - The only tough challenge Stevens should face next year will not be in Alaska, but here in Washington. Assuming the Republicans maintain control of the Senate (a fairly safe bet at this time), Stevens, the Majority Whip, has made it clear that he is interested in succeeding retiring Senate Majority Leader Baker. While Bob Dole of Kansas is an early favorite for this top slot, Dick Lugar of Indiana and Pete Domenici of New Mexico have also shown interest. Nevertheless, Stevens' slot on the Defense Appropriations Subcommittee and his current Whip's role make him an increasingly more important player in future Senate action bearing on U.S. - Israel relations. While his past record is mixed, he has recently displayed a greater interest in the Middle East and could become of greater help in the future.

\***DAVID PRYOR (D-AR)** - Should Republican Congressman Ed Bethune decide to challenge Pryor, some analysts would consider Pryor "potentially vulnerable," despite a recent statewide poll showing Pryor beating Bethune 68% to 29%. No Democratic primary is expected, and Pryor has raised nearly \$350,000 to date. Pryor's consistent record of support is in contrast to Bethune's marginal support on issues of concern to us.

**BILL ARMSTRONG (R-CO)** - With both of Armstrong's potential Democratic opponents, Governor Richard Lamm and Rep. Tim Wirth definitely taking themselves out of the race, Armstrong's political fortunes have improved considerably. Nevertheless, Lt. Governor Nancy Dick, the only announced Democratic candidate, claims to be within striking distance of Armstrong -- according to a poll she has not yet released. However, her perceived weakness as a challenger to Armstrong has sparked interest among other individuals. Should Dick avoid a tough primary, this could prove to be an interesting race against an incumbent with only a fair, at best, record of support on issues of concern to us. The PAC has made modest contribution to Dick.

\***JOE BIDEN (D-DE)** - Governor Pete DuPont's decision not to challenge the popular and articulate Biden in next year's election, makes Biden, a Foreign Relations Committee activist, virtually safe to

\*indicates PAC support

Representative Jack Kemp's Administrative Assistant said he is considering challenging Bentley for the Republican nomination. Either candidate would present Long with formidable opposition in a marginal District. Given the challenge issued by the Arab lobby, it is a race we cannot afford to lose. The PAC has contributed its maximum to Long.

#### OTHERS

As of today, Israel's other principal supporters in the House on the key Foreign Affairs and Appropriations Committees appear to be in fairly good shape for next year's elections. One possible exception is Black Representative Bill Gray of the Foreign Operations Subcommittee. Gray, who has been a solid supporter, may face a tough primary challenge next spring.

Dante Fascell, who will become the next Chairman of the House Foreign Affairs Committee following the recent death of Clement Zablocki, should be in good political shape after a tough challenge last year. In addition, two veteran Committee colleagues, Democrat Howard Wolpe and Republican Ben Gilman who might still have difficult races, should be able to beat back strong challengers. Similarly, Democrat Matt McHugh and Republican Bill Green of the Appropriations Committee have consistently run close -- but victorious -- races in their marginal districts, and should be able to repeat their performance again next year. However, particularly where long-time friends are involved, the PAC has already contributed to the above-mentioned, as well as more than sixty other House of Representative supporters.

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#### PRESIDENTIAL POLITICAL NOTES - Morrie Amitay

O Since our last analyses of the Presidential contenders, two new Democratic candidates have officially launched their campaigns, Rev. Jesse Jackson, and former 1972 Presidential candidate George McGovern. What characterizes the candidacies of these two, other than the long odds on their success, is the clear departure from the other candidates on their positions regarding Israel and the Middle East.

#### JACKSON

Jackson's expressed purpose in seeking the Presidency is to create -- "leverage" to allow black involvement in a range of issues, including foreign policy. And as Rep. Mickey Leland has stated, "blacks are not just talking about foreign policy in regard to Africa and the Caribbean!" Jackson's dubious actions and pronouncements on the Middle East are at variance with the Democratic Party's traditional support for close U.S. - Israel ties, and offensive to the Party's significant Jewish constituency.

Jackson, the Director of the Chicago-based operation PUSH, has made his mark on Middle East politics with his outspoken support for, and his public embracing of PLO Chief Yassir Arafat. After embarking upon a "fact-finding" mission to the Middle East in 1979, Jackson declared that "one who does not regard Arafat as a true hero does not read the situation

AGE 6

correctly." He also called U.S. refusal to recognize the PLO an "international absurdity," and announced his support for the creation of a Palestinian state, claiming that a pro-Israel attitude endangered America's "vital interests." Recently, Jackson has moved from claiming there is "a misperception," of his Mideast positions, to saying "increased strategic cooperation with Israel is vital to our national interest." It is reasonable to assume that the reality of fundraising from Democratic Party sources prompted this positive declaration rather than a genuine change of heart.

## McGOVERN

When George McGovern announced his surprising candidacy for President, he pledged to say nothing about any issue except what he honestly believed. In doing so with regard to Israel, he has followed the same critical line which has characterized his actions of the past few years. With a George Orwell-like attitude of "saving Israel despite itself," McGovern "deplored" the "totally unjustified" Israeli invasion of Lebanon and denounced its settlements policy on the West Bank. He has described former Israeli Prime Minister Begin as a "reactionary militarist . . . and a disgrace both to Judaism and the Israeli nation," and has termed efforts by American officials to promote strong U.S. - Israeli relations as constituting "bullying tactics" and "McCarthyism." Hiding behind his perception of the attitude of some American Jewish "doves," and citing Chancellor Bruno Kreisky, McGovern is demonstrating the same lack of understanding of American Jewish concerns he exhibited as a former member of the Senate Foreign Relations Committee. In an October campaign speech before Maine Democrats, McGovern denounced the national Democratic Party's pro-Israel Lebanon resolution at its 1982 Midterm Convention, and insisted that a "reshaping" of Israel would have been more appropriate.

While one might concede that McGovern means well, Israel's supporters can console themselves in the knowledge that his chances of winning the nomination, much less the Presidency, are just about nil. In fact, many believe that if McGovern were to run against Richard Nixon today, the result would be the same as before!

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ELECTION DAY NOVEMBER 2, 1982 - APRIL 1, 1984

| <u>CANDIDATE</u>     | <u>CHECK DATE</u> | <u>SENATE</u> | <u>PURPOSE</u>     | <u>AMOUNT</u> |
|----------------------|-------------------|---------------|--------------------|---------------|
| Max Baucus (D)       | 11/24/82          |               | Dinner Event       | \$ 150        |
| "                    | 12/09/82          |               |                    | 300           |
| "                    | 05/02/83          |               | PAC Luncheon       | 2000          |
| "                    | 06/30/83          |               |                    | 1000          |
| Joe Biden (D)        | 10/02/83          |               | NY Event           | 1550          |
| Jeff Bingaman        | 02/28/84          |               |                    | 1500          |
| "                    | 01/28/83          |               | 1982 Debt. Retire. | 1000          |
| "                    | 09/12/83          |               |                    | 500           |
| Rudy Boschwitz (R)   | 04/13/83          |               | event              | 500           |
| "                    | 11/21/83          |               |                    | 2000          |
| "                    | 5/2/84            |               |                    | 1,000         |
| Bill Bradley (D)     | 11/09/82          |               | Dinner event       | 1000          |
| "                    | 04/09/83          |               |                    | 1000          |
| "                    | 05/05/83          |               |                    | 2000          |
| "                    | 06/21/83          |               |                    | 1000          |
| Tom Corcoran (R)     | 01/20/83          |               | PAC Luncheon       | 500           |
| "                    | 04/08/83          |               |                    | 1000          |
| "                    | 06/15/83          |               |                    | 2000          |
| "                    | 10/02/83          |               |                    | 500           |
| "                    | 01/25/84          |               |                    | 1000          |
| Rafonse D'Amato (R)  | 05/16/83          |               | 1986               | 1000          |
| Norm D'Amours (D)    | 04/13/83          |               | (House)            | 300           |
| "                    | 02/01/84          |               | PAC Luncheon       | 2500          |
| "                    | 03/30/84          |               |                    | 2500          |
| Nancy Dick (D)       | 08/31/83          |               |                    | 1000          |
| Chris Dodd (D)       | 05/24/83          |               | 1986               | 1000          |
| Bob Dole (R)         | 4/24/84           |               | 1987               | 2,000         |
| Dave Durenberger (R) | 02/07/84          |               | 1988               | 250           |

CANDIDATE.

CHECK DATE

PURPOSE

Al Gore (D)

05/27/83  
06/28/83  
01/05/84  
02/27/84

PAC LUNCHEON

\$ 500  
2000  
500  
2000  
\$5000  
REMA

Tom Harkin (D)

06/27/83  
09/17/83  
02/28/84  
03/30/84  
05/16/83

PAC LUNCHEON

2000  
2000  
1000  
1000  
1000  
\$500  
REMA

Paula Hawkins (R)

1986

Howell Heflin (D)

04/26/83  
5/19/83

event  
PAC Luncheon

1000  
4000  
\$5

Jim Hunt (D)

10/10/83  
11/18/83  
02/16/84

2000  
1000  
2000  
\$5  
PR

Sen. Bob Kasten (R)

09/15/83

500

Sen. Edward Kennedy (D)

5/19/83  
3/30/84

event  
Fr 1988

1000  
1000

Sen. Frank Lautenberg  
(D)

03/15/83  
03/30/84

1983 debt

500  
1000

Sen. Carl Levin (D)

05/12/83  
06/15/83  
09/19/83

500  
2000  
2500

Sen. Sam Nunn (D)

04/13/83

event

1000

Sen Bob Packwood (R)

07/14/83

1986

1000

Sen. Claiborne Pell  
(D)

10/17/83

event

1000  
2000

4/19/84

|                         |  |   |                                      |
|-------------------------|--|---|--------------------------------------|
| Rep. Larry Pressler (R) | 03/01/83<br>10/11/83                         | PAC Luncheon                                  | \$1000<br>1000                       |
| Rep. David Pryor (D)    | 07/28/83                                     | PAC Luncheon                                  | 2000                                 |
| Rep. Rockefeller (D)    | 11/21/83                                     | 12/14 Event                                   | 1000                                 |
| Rep. Jim Sasser (D)     | 12/09/82<br>04/13/83                         | 1982 Debt.                                    | 500<br>500                           |
| Rep. Simon (D)          | 05/11/83<br>01/19/84<br>02/06/84<br>03/05/84 | House<br>NY Event<br>NY Event<br>1982 Debt.   | 1250<br>1500<br>2500<br>1000<br>1000 |
| Rep. Arlen Specter (R)  | 07/14/83                                     |   |                                      |
| Rep. Alan Simpson (R)   | 02/22/83<br>01/10/84                         | event   | 500<br>500                           |
| Rep. William Winter (D) | 03/01/84<br>04/05/84                         |   | 2000<br>1000                         |
| <u>HOUSE</u>            |  |   |                                      |
| Rep. Joe Addabbo (D)    | 05/11/83<br>10/05/83                         | event   | 300<br>200                           |
| Rep. Gary Ackerman (D)  | 05/27/83<br>12/12/83<br>01/20/84             | event<br>special election<br>special election | 500<br>500<br>500                    |
| Rep. Frank Annunzio (D) | 1/31/84                                      |   | 250                                  |
| Rep. Les Aspin (D)      | 04/13/83<br>11/02/83                         |   | 250<br>250                           |
|                         | 5/1/84                                       | conf  | 500                                  |

5,110



KT- 54-  
Pacy

Corcoran for Senate Exploratory Committee  
P.O. Box 2667 • Aurora, Illinois 60507

February 9, 1983

Mr. Morris J. Amitay  
Washington Political Action Committee  
400 North Capitol Street, N.W.  
Washington, D.C. 20001

Dear Morrie,

Many thanks for your words of encouragement regarding the Senate possibility, and for the generous check you enclosed from the Washington PAC. I can assure you that your contribution is greatly appreciated and will be carefully spent.

I'll be keeping in touch with you in the coming months.  
With my best personal regards, I am

Sincerely,

A handwritten signature of Tom Corcoran, written in dark ink, enclosed within a circular outline.

Tom Corcoran  
Representative in Congress

TC/jp

EXHIBIT

cc [initials]

35040511528

WASHINGTON POLITICAL ACTION COMMITTEE

400 NORTH CAPITOL STREET, N.W.

SUITE 168

WASHINGTON, D.C. 20001

TELEPHONE  
(800) 347-6618

TREASURER  
MORRIS J. AMITAY

ADVISORY BOARD

DANIEL ABRAHAM  
MORRIS J. AMITAY  
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JIM MITCHELL  
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JIM KAUFMAN  
JIM R. KOTEN  
JIM MEDALIE  
JIM METTERSON  
JIM MICHAN  
JIM PECK  
JIM RICE  
JIM RICE  
JIM RUSSELL  
JIM SCHAPIRO  
JIM SCHARF  
JIM SCHUCHET  
JIM SHORE  
JIM SHUSMAN  
JIM SLATER  
JIM STERNBUCH  
JIM STERN  
JIM TILES  
JIM TOLTZ  
JIM WHITE  
JIM WOLFE

April 7, 1983

Hon. Tom Corcoran  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Tom:

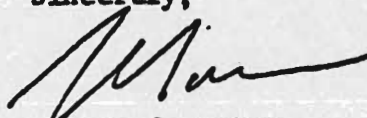
It was good of you to come to our luncheon yesterday and the group was impressed by your articulation and candor.

As I promised, I am enclosing our PAC's additional check for \$1000 along with our best wishes for your success.

I will be calling for an appointment to see you next week to discuss a number of matters.

With best wishes,

Sincerely,



Morris J. Amitay

MJA/pb

Enclosure

MORRIS J. AMITAY, TREASURER  
WASHINGTON POLITICAL ACTION COMMITTEE  
400 NORTH CAPITOL STREET, N.W., SUITE 168  
WASHINGTON, D.C. 20001

1340

April 8 1983 <sup>15-52</sup>/<sub>100</sub>

PAY TO THE  
ORDER OF

Corcoran Exploratory Committee

\$ 1,000<sup>00</sup>/<sub>100</sub>

One Thousand <sup>00</sup>/<sub>100</sub>

DOLLARS

NS&T BANK, N.A.  
WASHINGTON, D. C. 20005



82

STATEMENT OF JERRY BENJAMIN

1. My name is Jerry Benjamin. My address is A.B. Data, Ltd., 8050 North Port Washington Road, Milwaukee, Wisconsin 53217.
2. This response was originally due on May 22, 1984. An extension of time until June 6, 1984, was obtained.
3. I have been with A.B. Data, Ltd. for three years and am currently its President.
4. A.B. Data provides a range of direct mail consulting and services. For some constituencies, A.B. Data's lists are by far the best available. On occasion, the services of A.B. Data have been utilized in a primary by candidates for nomination by both parties.
5. I have known Michael Goland for some time, pre-dating his decision to use the services of A.B. Data. He contacted me concerning proposed mailings in opposition to the reelection of Senator Charles Percy. The mailings were written by Mr. Goland. The only involvement of A.B. Data was to provide a mailing list and mailing services. There was no coordination of Mr. Goland's expenditures with any candidate's campaign by A.B. Data.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. 28 U.S.C. Section 1746.



Jerry Benjamin

Executed on June 4, 1984.

TO: Our subscribers

April 23, 1984

FROM: Alan Baron

No. 202

PRESIDENTIAL POLITICS: LEADERSHIP

Leadership is not, as sometimes suggested, motivating people to sacrifice their self-interest for the public interest. Rather, it is motivating them to sacrifice short-term self-interest (instant gratification) for their longer-term (enlightened) self-interest, likely to be consistent with the public interest.

Leadership and political campaigns do not go well together, since candidates' schedules move them from one instant gratification group to another. The failure of a candidate to exert leadership is as predictable as the failure of an individual to remain on a strict diet while walking in and out of bakeries all day long.

But, this year, the lack of leadership seems even more pervasive than usual. President Reagan, fearful of the National Rifle Association, even refuses to support a ban on bullets manufactured to pierce bullet proof vests. And he opened his campaign with self-righteous statements on school prayer to New Right religious groups, attacking the character of his opposition, something he has seldom engaged in in recent years.

Pandering hit a high when Mondale and Hart promised NY Jews they would move our embassy in Israel from Tel Aviv to Jerusalem. That would have no direct impact on Israel's economic and military security and its long-term impact would, ironically, be negative. It would be a gratuitous slap-in-the-face to Moslem states (including non-Arab ones like Pakistan) and moderate Arab leaders (who've advocated keeping communications open with the United States) - reducing America's minimal remaining credibility in prodding Arabs to negotiate. A side effect would escalate terrorist attacks on Jewish holy sites. Hart did hesitate a moment before yielding. ("It's just one croissant. Gary, you can go back on your diet in the morning," friends said, so to speak.) Mondale wasn't on a diet in the first place, which is why he campaigns with so much excess weight.

Last week, Reagan showed some restraint: he refused to promise Homebuilders he would never advocate altering the most sacrosanct section of the tax code: home mortgage interest deductions. (The last candidate to say that was Jimmy Carter in 1976, who reversed himself almost immediately.) Assuming Reagan's reelected, he'll no doubt disguise his 1985 tax increase as "tax simplification" - and the idea is, to be sure, very "hot" now - on the left (Sen. Bradley, D-NJ), center (Sen. DeConcini, D-AZ) and right (Rep. Kemp, R-NY). Still, President Reagan is not likely to advocate closing the mortgage loophole and Congress, which has recently been adding more loopholes, is even less likely to approve.

Nevertheless, Reagan deserves points for his modest "profile in courage," especially considering his competitors. The Israel embassy issue is the clearest example of their lack of leadership, but their failure to lead was even more clearly demonstrated by their reactions to defeat.

Political/media consultant Bob Squier says the low point of a campaign is when the candidate starts blaming the voters. Most Presidential candidates are beyond that, but not Mondale and Hart. After New Hampshire, Mondale attacked "yuppies" (young, urban professionals) for being taken in by "tinsel" and being selfish (fiscally moderate). After Pennsylvania, Hart blamed his defeat on voters afraid of change. The real fault rested with the candidates, who failed to lead.

84

PRESIDENTIAL POLITICS: ELECTABILITY

Despite Walter Mondale's momentum, polls continue to show Gary Hart running stronger against Ronald Reagan. The latest, Harris, puts Reagan 1% ahead of Hart (47-46%) and 16% ahead of Mondale (55-39%).

Why the disparity?

To be sure, it partly reflects Hart's appeal to swing voters, particularly those attracted to candidacies like John Anderson's. The very characteristics of the Coloradoan which make hardcore Democrats uneasy - independence, fiscal moderation, coolness, etc. - are precisely those that make it easier for such voters to support him than Mondale.

But there is a far more fundamental reason. As BR Associate Editor Bill Schneider observes, there are two basic kinds of elections: referendums on incumbents and choices between contrasting alternatives. Of course, most elections include elements of each: 1980 was first a negative referendum on Carter, but Reagan could not have won had he not convinced the public he was an acceptable choice, providing no major risk of making things worse (e.g., starting WW III, stopping Social Security) and some hope for making things better (e.g. Reaganomics).

A Reagan/Hart battle would be like 1980: primarily a referendum on the incumbent. And Reagan's failure to decisively defeat opponents in matchups of this nature has been clear in polls throughout his term.

A Reagan/Mondale battle is now perceived as a choice between policies of the past (New Deal liberalism, the Carter Administration) and present. And the public's choice has also been clear throughout RR's term, which is why pollster Dick Wirthlin and other WH strategists have long preferred facing Mondale.

How meaningful are the current polls?

As indicated below, history is in their favor. But things could change:

- (1) Continuing losses by Hart would reduce his strength against Reagan.
- (2) The referendum could turn decisively negative to Reagan, whose vulnerability on Central America and interest rates is increasing.
- (3) Mondale's identification with past Democratic policies could fade, when/ if he wins the nomination and focuses his campaign on November. However, Reagan will be expert in framing the issue as New Deal vs. New Ideas. After all, as one GOP strategist puts it, he's been "using that script since 1966."

And even if Mondale has an opportunity to refocus the campaign, there's little indication he will: his primary campaign indicates his priority is just the opposite: to rebuild the old New Deal Coalition and convince Americans they were wrong in 1980 and interest group liberalism is right for the future.

It is an article of faith among politicians that people "outside the beltway" (Washington) could care less about electability. Republicans cite Nelson Rockefeller and Democrats, Edmund Muskie, as examples of candidates seeking the nominations on such grounds, to no avail. This year, that seems to have changed a bit. Ironically, there's been a role reversal; in Washington, some politicians and interest group leaders now see the campaign as a moral confrontation and Hart as downright evil. With their institutional credibility perceived to be at stake, many privately prefer Reagan to Hart. On the other hand, Hart voters increasingly mention electability as a major reason.

Why is this year different from all other years among these voters?

- (1) Seldom before has the difference between the candidates' general election strength been of this magnitude.
- (2) Never before has there been so much coverage of Exit Polls.
- (3) There are few deep issue or ideological differences. (Institutional credibility is irrelevant "outside the beltway.")
- (4) The Democrats are mainly motivated by restoring the pre-Reagan status quo, not a program of change.

Historical Note: In the last three decades, all five Presidents elected

after contested battles for the nomination had done better than their nomination opponents in Gallup's final pre-convention comparisons of "trial heats."

1952: Eisenhower led Kefauver by 20%; Taft trailed Kefauver by 9%. (Kefauver was the choice of 45% of Democrats polled, to 12% for Stevenson, who was drafted at the convention and not included in the "trial heats.")

1960: Kennedy ran only 2% behind Nixon, but Nixon lead Johnson and Stevenson by 12% and Symington by 14%.

1968: Nixon did better than Rockefeller against Humphrey and McCarthy. Although his margin was minimal (2-4%), and other polls produced other results, Gallup deflected the anti-Nixon electability argument.

1976: Carter consistently beat Ford by more than any other Democrat.

1980: In the last comparison, RR ran 25% behind Carter, but Carter beat Bush by 29%.

In other nomination battles, there were major differences twice. In 1964, Goldwater trailed Johnson by 59%; Scranton trailed by "only" 43%. In 1968, Humphrey trailed Nixon by 16%; McCarthy trailed Nixon by 5%. In both cases, the party nominated the weaker contenders, and lost.

### PRESIDENTIAL POLITICS: PRIORITIES

Americans would like their Presidents to possess FDR's strength, Truman's candor, Ike's statesmanship, JFK's wit, LBJ's shrewdness, Nixon's knowledge of world affairs, Ford's warmth, Carter's independence and Reagan's ability to communicate. But those qualities are, often, mutually exclusive, so priorities must be set.

In 1976 and 1980, Gallup measured various qualities of the candidates as perceived by the public. The following figures indicate the percentage of the public crediting each quality to each candidate in each year:

| Area:  | Carter |      | Ford Reagan |      | Carter Margin |      | CHANGE |
|--|--------|------|-------------|------|---------------|------|--------|
|  | 1976   | 1980 | 1976        | 1980 | 1976          | 1980 |        |
| CHARACTER/QUALIFICATIONS                         |        |      |             |      |               |      |        |
| Religious  | 72%    | 87%  | 40%         | 40%  | +32%          | +47% | +15%   |
| High Moral Principles                            | 68     | 83   | 64          | 70   | + 4           | +13  | + 9    |
| Says What Believes if Unpopular                  | 48     | 57   | 44          | 54   | + 4           | + 3  | - 1    |
| Bright, Intelligent                              | 72     | 73   | 58          | 73   | +14           | 0    | -14    |
| Good Judgment in Crisis                          | 55     | 58   | 55          | 58   | 0             | 0    | 0      |
| Clearly Understands Issues                       | 44     | 50   | 50          | 55   | - 6           | - 5  | + 1    |
| Sides with Average Citizen                       | 44     | 56   | 24          | 43   | +20           | +13  | - 7    |
| Sympathetic to Poor                              | 64     | 68   | 26          | 41   | +38           | +27  | -11    |
| IDEOLOGY   |        |      |             |      |               |      |        |
| Moderate/Middle-of-the-Road                      | 42     | 82   | 52          | 48   | -10           | +34  | +44    |
| LEADERSHIP APPROACH                              |        |      |             |      |               |      |        |
| Colorful, Interesting                            | 64     | 50   | 36          | 70   | +28           | -20  | -48    |
| Decisive, Sure of Himself                        | 56     | 37   | 50          | 69   | + 6           | -32  | -38    |
| Strong   | 48     | 31   | 36          | 65   | +12           | -34  | -46    |
| THEMATIC APPROACH                                |        |      |             |      |               |      |        |
| Modern, up to Date Solutions                     | 54     | 39   | 42          | 51   | +12           | -12  | -24    |
| Imaginative, Innovative Solutions                | 44     | 37   | 30          | 52   | +14           | -15  | -29    |
| Well Defined Program for Moving<br>Country Ahead | 40     | 27   | 34          | 53   | + 6           | -26  | -32    |

These comparisons indicate that Democratic problems in 1980 were far more fundamental than personal antipathy for Carter. Carter led RR in every aspect in the personal category but one, although Reagan did do better than Ford. Observations:

1. The failure of Carter's ideological edge to prove decisive did not reflect

an ideological shift. Polls showed people put themselves and Carter near the Center; Reagan far to the Right. Reagan overcame this by (a) emphasizing his pragmatic Gubernatorial record; (b) selling his positions with non-ideological arguments; (c) providing alternatives to government action (tax incentives, free enterprise zones, etc.); and (d) displaying independence from the New Right (excluding activists from key campaign positions, naming George Bush, etc.). Success still would not have been possible had not moderate/middle-of-the-road/establishment policies and Presidents (Johnson, Nixon, Ford, Carter) been discredited and the public's willingness to look to other options increased.

2. The key change from 1976 to 1980 was Carter's inability to provide the kind of Presidency - in terms of leadership and thematic approaches - Americans seek. He failed to define clear policy priorities and decisively fight for their implementation. That failure resulted from (a) Carter's technocratic, problem-solving approach to government and lack of priorities and/or any ideological/philosophical framework; and (b) the Democrats' lack of coherent priorities and programs for change, and the unwillingness of coalition interest groups to sacrifice instant gratification goals for common ones.

#### PRESIDENTIAL POLITICS: OTHER OBSERVATIONS

Surprises As the Gallup surveys from 1976 and 1980 on the previous page indicate, Walter Mondale should not have been surprised about the impact of Hart's New Ideas theme.

A review of 1980 election returns from Colorado indicates that Hart should not have been surprised by his poor showing among blue collar Democrats. In comparison to the Democratic candidate for the Board of Regents (the only other statewide office on the ballot), Hart ran strongest (12-18% ahead of his fellow Democrat) in the fast growing business and professional suburbs surrounding Denver (e.g. Boulder, Arapahoe, Jefferson and Douglas counties) and high tech boom towns (e.g. Fort Collins). Hart ran less well (about 8% ahead) in blue-collar places like Pueblo and Adams county near Denver. And he only ran about even with the Regents candidate in the southern Colorado mining counties with severe economic problems.

Indicators In BR197 (1/30/84), the critical swing voters in this year's election were identified by Associate Editor Bill Schneider according to their response to a question on the economy with three options for answers. Non-swing voters included the 24% who saw no real recovery and favored Mondale over RR, 73-19%, as well as the 30% who expected a longterm recovery and backed RR, 78-17%. The swing voters, 42%, saw the recovery as only temporary, and were closely divided, with Mondale ahead, 52-41%. Since that survey, the LATimes poll indicates that the "no recovery" group has fallen to 22%. But in New York and Pennsylvania, among primary voters, it was about 50% - regrettably not only for those states' workers, but also for Gary Hart.

Pragmatism As long as he's a serious candidate, Gary Hart is certain to sweep Colorado. And unless he's elected President, he's certain to stay in the Senate for nearly three more years. Thus, the Colorado Education Association has endorsed Hart, and the National Education Association has not objected. The Colorado AFL-CIO, as a division of the national, has no such option. It could, however, play a similar game by taking it easy, and many unions are doing that. The state federation is not, and is expected to spend over \$75,000 for Mondale. No one can accuse them of hypocrisy - or pragmatism.

NOTE: BR 196 identified Glenn Dawson as a member of William Dawson's family; he is (to those who know him, obviously) not. Morris Amitay, ex-Director of the American Israeli Public Affairs Committee, says he did not engage in "raising funds and advising" Rep. Corcoran, but acknowledges signing PAC checks to Corcoran and conducting an interview on Israel, distributed by the campaign.



ATTORNEY AT LAW  
MORRIS J. AMITAY, P.C.  
400 NORTH CAPITOL STREET, N.W.  
SUITE 168  
WASHINGTON, D.C. 20001  
(202) 347-8613

6-8-83

Mike: - I checked after fax call.

Re a direct mail house  
for your Percy mailing - A.B.

Datz (Benjamin) is only one  
with best lists and experience.

They do almost all political direct  
mail to Jews. (e.g. Weicker)

Suggest they only do actual  
mailing to their lists to avoid  
any problems should they do  
anyone in Ill. Senate race.

See you,

Morri

85040511535

ATTACHMENT IV



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 2667  
Aurora, Illinois 60507

RE: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Keck:

The Federal Election Commission notified you on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time. We acknowledge receipt of your explanation of this matter which was dated May 18, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe the Corcoran for Senate Committee and you, as treasurer, have violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that the committee and you, as treasurer, accepted excessive contributions, in the form of coordinated expenditures, from Michael Goland. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such materials within ten days of your receipt of this notification. All statements should be under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you and 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.

3 5 0 4 0 5 1 1 5 3 6

Letter to William Keck  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

cc: Representative Corcoran

35040511537

90

ATTACHMENT V



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Steven A. Nissen, Esq.  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

RE: MUR 1684  
Morris Amitay

Dear Mr. Nissen:

On May 7, 1984, the Commission notified your client, Morris Amitay, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1984, determined that on the basis of the information in the complaint, and information provided by your client there is no reason to believe that a violation of any statute within its jurisdiction has been committed by Morris Amitay. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The attached order which requires your client to provide certain information has been issued in connection with the ongoing investigation. The Commission no longer considers Mr. Amitay to be a respondent, but rather considers him a witness only. Your client is required to submit the information under oath within ten days of your receipt of this order.

3 5 0 4 0 5 1 1 5 3 8

Letter to Steven A. Nissen  
Page 2

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

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Enclosures  
Order and questions

35040511539

BEFORE THE FEDERAL ELECTION COMMISSION

Morris Amitay

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on \_\_\_\_\_, 1984.

\_\_\_\_\_  
Lee Ann Elliott  
Chairman

ATTEST:

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

Attachment(s)

35040511540

**FEDERAL ELECTION COMMISSION**

To: Morris Amitay  
MUR 1684

**INTERROGATORIES**

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain primarily to your position with Washington PAC and your relationships with Michael Goland and Representative Tom Corcoran.

(1) Have you ever been a member of Washington PAC?

a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

b) Describe the circumstances of how you came to know of Washington PAC.

c) State the purpose of Washington PAC.

(2) Are you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

(3) Do you know Tom Corcoran?

a) If so, please state how and when you met Mr. Corcoran.

b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

1) Were the two of you personal friends at the time?

2) Did you see him socially?

a) If so, how often on the average?

c) Describe your relationship with the Mr. Corcoran at present.

35040511541

- 1) Do you see him socially?  
a) If so, how often on the average?
- d) When and where was the last occasion you spoke with Mr. Corcoran?  
1) On that occasion, what was the substance of your conversation?  
2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?  
a) If so, what was the substance of your conversation(s)?
- (4) Did you ever have business dealings with Mr. Corcoran?  
a) If so, describe in detail the nature of your business dealings and state when they occurred.  
b) How often did you see him for this purpose during such dealings?
- (5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?  
a) If so, how often on the average?
- (6) Do you know Michael Goland?  
a) If so, state how and when you met Mr. Goland.  
b) Describe your relationship with Mr. Goland.  
1) Do you see each other socially?  
a) If so, how often on the average?  
2) When and where was the last occasion you saw or spoke with Mr. Goland?  
a) On that occasion, what was the substance of your discussion?  
b) Have you discussed this investigation, with Mr. Goland?  
1) If so, what was the substance of your conversation(s).
- (7) Did you ever have business dealings with Mr. Goland?  
a) If so, describe in detail the nature of your business dealings and state when they occurred?  
b) How often did you see him for this purpose during such dealings?

35040511542

(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

- a) If so, how often on the average?
- b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

- a) If so, when did the presentation(s) and viewing(s) occur?
- b) What was the substance of the presentations? Was campaign strategy discussed?
  - 1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?
    - a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.
    - b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.
      - a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

(10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

- 1) If so, when?
- 2) Describe the substance of each such discussion and communication.

(11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

- a) If so, describe what kind of assistance you provided as a result of the request?

35740511543

(12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

- a) If so, what suggestions or strategies did you discuss with him?
- b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

(13) Have you and Mr. Goland ever discussed the Percy campaign?

- a) If so, when and where did these discussions take place?
- b) Describe the content and substance of the discussions.

(14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

- a) If so, what was the substance of the advice requested by Mr. Goland?
- b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

(15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

- a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?
- b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.
- c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?
- d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?
- e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

(16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

- a) If so, what was the substance of the discussion or communication regarding this advice?
- b) When did such discussions or communications with Mr. Corcoran occur?

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(17) Did you ever interview Mr. Corcoran?

a) For each such interview state:

- 1) The date and location of the interview.
- 2) Who was present at the interview.
- 3) The purpose of the interview.
- 4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.
- 5) The content and substance of each interview.
  - 1) Was the subject of the Corcoran campaign discussed?
    - a) If so, describe what about the Corcoran campaign was discussed during the interview.

(18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

a) If so, for each such brochure answer the following:

- 1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?
- 2) Did you voluntarily appear in the picture on the fundraising brochure?
- 3) By what procedure were you selected to appear on the fundraising brochure?
- 4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?
- 5) When and where was the picture used in the brochure taken?
- 6) For what purpose did your picture appear on the brochure?
- 7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?
- 8) Did you assist or have any input into the development of the brochure?

(19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

- a) If so, when and in what capacity were you working?
- b) How long did you work in each such capacity?

35040511545

Morris Amitay  
MUR 1684  
Interrogatories  
Page 6

(20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

a) For each such fundraiser, state when and where it occurred.

35040511546

ATTACHMENT VI



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Steven A. Nissen, Esquire  
11355 W. Olympic Boulevard  
Los Angeles, California 90067

Re: MUR 1684  
Michael Goland

Dear Mr. Nissen:

The Federal Election Commission notified your client, Michael Goland, on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your client, the Commission on , 1984, determined that there is reason to believe Mr. Goland has violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. Specifically, it appears that he made excessive contributions, in the form of coordinated expenditures, to the Corcoran for Senate Committee.

Your client's response to the Commission's initial notification of this complaint did not provide complete information regarding the matters in question. Consequently, the Commission has issued the attached order that requires Mr. Goland to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. Answers to the enclosed questions must be submitted within 10 days of your receipt of the enclosed order. All statements must be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client, 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.

35040511547

Letter to Steven A. Nissen  
Page 2

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

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Enclosures  
Order and questions

85040511548

BEFORE THE FEDERAL ELECTION COMMISSION

Michael Goland

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on \_\_\_\_\_, 1984.

\_\_\_\_\_  
Lee Ann Elliott  
Chairman

ATTEST:

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

Attachment(s)

35040511549

**FEDERAL ELECTION COMMISSION**

To: Michael Goland  
MUR 1684

**INTERROGATORIES**

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain primarily to the expenditures you made against Senator Percy in the 1984 Illinois primary and your relationship with Morris Amitay, Tom Corcoran and the Corcoran for Senate Committee. All questions are to be answered under oath.

Commission records disclose that you made substantial expenditures, which you describe as "independent expenditures," against the re-election of Senator Charles Percy of Illinois during the 1984 primary race.

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

a) State whether the funds used to make the expenditures were personal funds.

b) State whether you received contributions from others in support of your effort.

1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

(6) Did you contribute any funds in support of the Corcoran campaign?

a) If so, when and in what amount(s)?

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- b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?  
c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

(7) Do you know Tom Corcoran?

- a) If so, please state when and how you met Mr. Corcoran.  
b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

1) Did you see him socially?

a) If so, how often on the average?

- c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.

1) Have you seen him socially?

a) If so, how often on the average?

- d) When and where was the last occasion you spoke with Mr. Corcoran?

1) State the substance of your conversation.

2) State whether you have discussed this investigation with Mr. Corcoran.

a) If so, state the substance of each such conversation, when it occurred and who else was present.

(8) State whether you have ever had business dealings with Mr. Corcoran.

a) If so, describe in detail the nature of your business dealings and state when they occurred.

b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

a) If so, how often - on the average?

b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

a) If so, list the dates of your membership

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- 1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.
- 2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

b) Describe the circumstances of how you came to know of Washington PAC?

(11) Did you ever speak with Tom Corcoran at the PAC's offices? For each such conversation state:

- a) When you spoke with Mr. Corcoran.
- b) Whether it was face-to-face or by telephone.
- c) The nature of the discussion.
- d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- e) Whether you had begun to make expenditures against Senator Percy's campaign.
- f) Whether you had made any contributions to the Corcoran campaign.

(12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

- a) If so, when?
- b) Describe the substance of each such discussion and communication.

(13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

- a) If so, when?
- b) Describe the substance of each such discussion and communication.

(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

- a) If so, describe what assistance you provided his campaign.

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(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning to his campaign?

a) If so, state when and what suggestions or strategies did you discuss with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

a) Describe your relationship with Mr. Amitay.

1) Do you see each other socially?

a) If so, how often on the average?

2) When and where was the last occasion you saw or spoke with Mr. Amitay?

a) On that occasion, what was the substance of your discussion?

3) Have you discussed this investigation, or any part of this investigation, with Mr. Amitay?

a) If so, when and what was the substance of your conversation(s)?

(18) Did you ever have business dealings with Mr. Amitay?

a) If so, describe in detail the nature of your business dealings and state when they occurred?

b) How often did you speak to him for business purposes during such dealings?

(19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

a) If so, how often - on the average?

b) When was the last time you spoke with Mr. Amitay by telephone?

1) What was the subject and purpose of your discussion?

(20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

a) If so, when did the presentation(s) occur?

1) Did you ever speak with Tom Corcoran following his presentation?

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a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran? If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

- a) If so, list the date(s) of the interview(s).
- b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?
- c) What input did you have in the coordinating or arranging of the interview(s)?
- d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

If so, for each such discussion state:

- a) When and where the discussion took place.
- b) The substance of the discussion.
- c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- a) If so, when and where did these discussions take place?
- b) Describe the content and substance of each such discussion.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

- a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

- a) If so, for each occasion on which such advice was given state:
  - 1) the date the advice was given.
  - 2) the substance of the advice.

35040511554



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

The Honorable Tom Corcoran  
R.R. 2  
Ottawa, Illinois 61350

Re: MUR 1684  
Corcoran for Senate Committee  
William Keck, as treasurer

Dear Mr. Corcoran:

3 5 0 4 0 5 1 1 5 5  
The Federal Election Commission notified you on May 7, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission on , 1984, determined that there is reason to believe that the Corcoran for Senate Committee and William Keck, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that your committee and its treasurer accepted excessive contributions from Michael Goland in the form of coordinated expenditures.

Although the committee treasurer is responsible for the acts of the committee we believe that you, as the candidate, should be made aware of this development. A copy of our letter to your committee treasurer is enclosed.

An investigation of this matter is being conducted. The attached order, which requires you to provide certain information has been issued in connection with that investigation. The Commission does not consider you to be a respondent, but rather a witness only. You are required to submit the information under oath within ten days of your receipt of this order.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express

The Honorable Tom Corcoran  
Page 2

written consent of the parties with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Enclosures  
Order  
Interrogatories  
Letter to Corcoran Committee

95040511556

BEFORE THE FEDERAL ELECTION COMMISSION

Tom Corcoran

MUR 1684

ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election has hereunto set her hand on \_\_\_\_\_, 1984.

\_\_\_\_\_  
Lee Ann Elliott  
Chairman

ATTEST:

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

Attachment(s)

35040511557

**FEDERAL ELECTION COMMISSION**

TO: Representative Tom Corcoran  
MUR 1684

**INTERROGATORIES**

The following questions are posed in furtherance of the Commission's investigation in this matter. The questions pertain to your campaign for the U.S. Senate in Illinois and your relationship with a Morris Amitay prior to and during the campaign. You are requested to answer all questions under oath.

(1) Please state the date or approximate date on which you first met Morris Amitay?

(2) Please describe the circumstances of how you came to meet Mr. Amitay.

a) Describe your relationship with Mr. Amitay, if any, prior to your registration as a candidate to the U.S. Senate.

1. Were the two of you personal friends prior to your registration?

2. Did you see him socially?

a) If so, how often on the average?

3) Have you had the occasion to discuss this investigation with Mr. Amitay?

a) If so, state when and describe the substance of your conversation(s).

(4) Have you ever had business dealings with Morris Amitay?

a) If so, describe in detail the nature of your business dealings and state when they occurred.

b) During such dealings, how often did you speak to him for business purposes?

(5) Have you ever spoken to Mr. Amitay by telephone subsequent to your registration as a candidate for the U.S. Senate?

a) If so, how often - on the average?

b) When was the last time you spoke with Mr. Amitay by telephone?

1) What was the subject and purpose of your discussion?

(6) Please state how and when you became aware of the political action committee known as Washington PAC?

a) Describe your understanding of the purpose of the Committee.

b) State whether you have ever been a member of Washington PAC and include the dates of membership.

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c) Prior to your registration as a candidate for the U.S. Senate, were you privy to the names of any of the members of Washington PAC?

1) If so, state the names you were privy to, how you became privy to them.

d) Have you ever discussed your campaign or your campaign's strategy with any member of Washington PAC?

1) If so, when and with whom?

2) Describe the substance and content of each such discussion.

3) Who else was present at the time of each such discussions?

(7) Prior to your registration as a senatorial candidate, were you aware that Morris Amitay was a board member of Washington PAC?

a) If so, how was it that you became aware of that fact?

b) If not, when and how did you become aware of that fact?

(8) Describe your relationship with Mr. Amitay since your registration as a candidate for the U.S. Senate.

a) Do you ever see him socially?

a) If so, how often on the average?

b) Have you had business dealings with Mr. Amitay?

1) If so, how often on the average did you see and/or speak to him in relation to your business dealings?

2) Have you ever given Mr. Amitay the authority to conduct any type of business on your behalf?

3) Has Mr. Amitay ever voluntarily conducted business on your behalf?

c) Have you discussed your campaign or your campaign's strategy, goals and purposes with Mr. Amitay?

1) If so, when?

2) Describe the substance of each such discussion and/or communication.

3) Who else was present during each such discussion?

4) Was Michael Goland ever present during each such discussion?

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- 3 5 0 4 0 5 1 1 5 6 0
- d) Has Mr. Amitay ever given you advice or strategy hints relevant to your campaign?
1. If so, when?
  2. Describe the substance of the discussions or communications.
  3. Who else was present when this occurred?
- e) Have you and Mr. Amitay ever discussed the Percy candidacy or campaign?
- 1) If so, when?
  - 2) Describe the substance of each such discussion.
- f) Have you and Mr. Amitay ever discussed Michael Goland's expenditures against Senator Percy?
- 1) If so, list the date of each such discussion.
  - 2) Describe the substance and content of each such discussion.
- g) Did you speak with Mr. Amitay by telephone subsequent to your registration as a senatorial candidate?
- 1) How often on the average?
  - 2) For what purpose?
- h) Have you communicated with Mr. Amitay in writing for any reason?
- 1) If so, what was the nature of each such communication?
  - 2) Please provide the date on which each such communication occurred.
  - 3) Please describe the purpose and content of each such communication.
- (9) Have you ever appeared before Washington PAC board members?
- a) Please list the date of each such appearance.
  - b) Describe the purpose of each such appearance.
  - c) Describe in detail any contact made with Washington PAC for the purpose of arranging each such appearance.
    - 1) Was the contact by telephone, face-to-face or in writing?
      - a) With whom was contact established and on what date(s) was such contact made.
    - 2) For each such appearance; state whether Morris Amitay and/or Michael Goland were present.
    - 3) For each such appearance, state the substance of your presentation.
    - 4) Has Washington PAC or any member of Washington PAC participated in or conducted fundraisers on your behalf?
      - a) If so, who conducted the efforts and when did they occur?
      - b) What was the result of the efforts?

(10) Were you ever interviewed by Morris Amitay?

- a) Please list the date and location of each such interview.
- b) For each such interview state:
  - 1) Who was present.
  - 2) The purpose of the interview.
  - 3) The substance of the interview.
  - 4) Whether the Corcoran campaign goals and/or strategy were discussed.
    - a) If so, describe which aspects of the Corcoran campaign were discussed during the interview.

(12) Are you aware of fundraising brochure(s) developed by the Corcoran Committee in which you and Mr. Amitay are both pictured?

- a) For each such brochure, please answer the following:
  - 1) Why Mr. Amitay's picture was selected to appear on the brochure?
  - 2) Was Mr. Amitay informed by the Corcoran Campaign that his picture was going to be used on the brochure?
  - 3) When and where was the picture used in the brochure taken?
  - 4) Was Mr. Amitay compensated for the use of his picture in the brochure?
  - 5) Whose idea was it to use the picture in the brochure?
  - 6) Did Mr. Amitay have any input into the composition of the brochure?

(13) Do you know Michael Goland?

- a) If so, state when and how you met.
- b) Describe your relationship with Mr. Goland.
  - 1) Do you see Mr. Goland socially? If so, how often on the average?
  - 2) Have you ever had any business dealings with Mr. Goland?
    - a) If so, when?
    - b) If so, how often on the average did you have contact with him in relation to those dealings?

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c) During the time you were running for Senate, did you speak with Mr. Goland by telephone?

1) If so, how often - on an average?

d) Have you ever communicated with Michael Goland in writing for any reason?

2) If so, state the date on which each such communication occurred.

3) State the subject, purpose and content of each such communication.

(14) Have you ever discussed the following with Mr. Goland:

1) your candidacy?

2) your campaign's goals?

3) your campaign committee strategy?

4) Senator Percy's campaign?

5) this investigation?

(15) If the response to any portion of question 14 is yes, state the date and substance of each such discussion.

(16) During your candidacy, were you aware that Michael Goland was making substantial expenditures against the re-election of Senator Percy?

a) Please state when you learned of the expenditures and state the name of each person who told you about them and the substance of the notification.

(17) Do you know whether Michael Goland and Morris Amitay are personal friends?

a) If so, when and how did you become aware of this information?

b) Have you ever met with Messrs. Amitay and Goland together?

1) If so, describe the nature of each such meeting including, but not limited to, the date of the meeting, the location, how the meeting was arranged and the purpose of the meeting.

c) If there were follow-up communications regarding any or all of the meeting please state:

1) the date on which each such communication occurred.

2) the method by which each such communication was made

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Tom Corcoran  
Interrogatories  
MUR 1684  
Page 6

(e.g., telephone conversation, face-to-face conversation, written correspondence).

3) the name of each person involved in the communication.

4) the subject, content and purpose of each such communication.

35040511563



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 8, 1984

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Michael Goland  
Morris Amitay

Dear Mr. Ifshin:

This is in reference to your letter dated October 26, 1984, requesting an extension of five days until November 5 to respond to the Commission's reason to believe notice and questions. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on November 5, 1984

We realize that the time to respond has elapsed so we are providing this information for your records.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

35040511564

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Michael Goland )  
Morris Amitay )

MUR 1684

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 5, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1684:

1. Grant the respondents the requested extension of five days in which to respond to the Commission's reason to believe finding and interrogatories.
2. Approve and send the letter attached to the General Counsel's October 31, 1984 Memorandum to the Commission.

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

Attest:

11-5-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

10-31-84, 2:48  
11- 1-84, 11:00

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**SENSITIVE**

RECEIVED  
OFFICE OF THE FEC  
CLERK SECRETARY

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

84 OCT 31 P 2: 48

October 31, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: Request for Extension  
MUR 1684  
Michael Goland  
Morris Amitay

By letter dated October 26, 1984, and on behalf of his clients Michael Goland and Morris Amitay, David Ifshin, requested an extension of five days in which to respond to the Commission's reason to believe finding and interrogatories. See Attachment. The letter explains that Mr. Goland's father has a terminal illness and an extension is necessary to insure complete and accurate responses. No reason was given in the letter as to why the response from Mr. Amitay could not be filed in a timely manner, however, because the reason set forth by Mr. Goland is reasonable, it will not delay the matter to accord the same period of time to Mr. Amitay.

The Office of General Counsel recommends that the Commission grant the requested extension for the reasons stated.

Recommendations

1. Grant the respondents the requested extension of five days in which to respond to the Commission's reason to believe finding and attached interrogatories.
2. Approve and send the attached letter.

Attachments

1. Request for Extension
2. Letter to David M. Ifshin, Esq.

95040511566

ATTACHMENT I

GCC #5314

MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

**SENSITIVE**

*Wife*  
*Brown*

WESTSIDE OFFICE

1325 WEST OLIVE BOULEVARD  
LOS ANGELES, CALIFORNIA 90064  
(213) 281-4000

SAN FRANCISCO OFFICE

FOUR EMERALD CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 981-7540

LOS ANGELES (DOWNTOWN)

511 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 466-8500

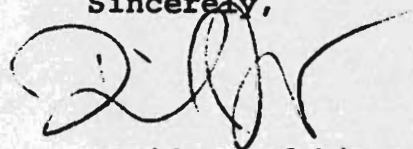
October 26, 1984

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

Dear Mr. Gross:

This letter confirms our telephone conversation of this morning. Michael Goland's father is in the final stages of a terminal illness and is not expected to survive the week. As a consequence, Mr. Goland has not been sufficiently available to permit the completion of the responses to his interrogatories. An extension of an additional five days from October 29 to November 5, 1984, therefore, is necessary to insure the submission of complete and accurate responses to the interrogatories directed to Mr. Goland and Mr. Amitay.

Sincerely,



David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak

CC: Charles Steele

14 OCT 26 1984 P 3:49  
RECEIVED  
FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL

35040511567

● Attachment II ●



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Michael Goland  
Morris Amitay

Dear Mr. Ifshin:

This is in reference to your letter dated October 26, 1984, requesting an extension of five days until November 5 to respond to the Commission's reason to believe notice and questions. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on November 5, 1984.

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

85040511568



CORCORAN FOR SENATE COMMITTEE  
P. O. BOX 2667 • AURORA, ILLINOIS 60507

060 # 5448  
RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

84 OCT 30 P 5: 15

October 29, 1984

Ms. Lee Ann Elliott  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Madame Chairman:

This letter responds to your letter dated October 5, 1984 in furtherance of the investigation of the above-captioned matter. I am enclosing my answers to the questions contained in the Interrogatories.

Sincerely,

Tom Corcoran  
Representative in Congress

Enclosure

85040511569

BEFORE THE FEDERAL ELECTION COMMISSION  
OF THE UNITED STATES OF AMERICA

IN THE MATTER OF  
CORCORAN FOR SENATE  
COMMITTEE, et al.

)  
)  
)  
MATTER UNDER REVIEW 1684

RESPONSE OF THE HONORABLE THOMAS CORCORAN  
TO THE INTERROGATORIES POSED TO HIM BY  
THE FEDERAL ELECTION COMMISSION

1. 3:00 p.m., December 13, 1982.
2. During the week of December 5, 1982, I received a telephone call from Paul Weyrich, who said that he had seen Morris Amitay in an airport that day. Amitay had asked him if he knew whether or not the rumors about Congressman Tom Corcoran challenging Senator Percy in the 1984 GOP Primary were true. Weyrich answered that he had had a couple of conversations with Corcoran, and he thought he was pretty serious about challenging Percy. Amitay then asked if Weyrich would find out if Corcoran were willing to meet with him. I agreed to the meeting with Amitay.  
  
Based on that telephone call with Weyrich, a meeting was arranged involving me and Morris Amitay, on December 13, 1982. That was the first meeting with Morris Amitay. We had never met before that time.
3. After the primary election campaign had ended, I saw Morris Amitay in the Rayburn House Office Building outside the Energy and Commerce Committee hearing room (Room 2123) as I was walking to a public meeting of that Committee, of which I am a member. We shook hands, and I asked what brought him to the Committee hearing. He said a bill in which he had an interest for a client. Regarding the Percy FEC complaint, I said that it was my observation that in matters like this, it is usually the loser who complains about the winner, not vice versa. We laughed and parted. Nothing else was said.
4. No.

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5. Yes

- a) Five or six times total.
- b) I cannot recall the date of my last conversation with Mr. Amitay.
  - 1. I do not recall the subject and purpose of my last conversation with Mr. Amitay.

6. In my meeting with Morris Amitay on December 13, 1982, he advised me that he had organized a political action committee, although I do not recall that he identified it by name.

- a) I understand that the purpose of the Washington PAC was to raise and expend monies on behalf of candidates who support better United States-Israel relations.
- b) I have never been a member of Washington PAC.
- c) Yes.
  - 1. Morris Amitay. My meeting with Amitay on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983. See answer, question 9.

d) No.

7. Yes.

- a) During my meeting with him on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983.
- b) Not Applicable.

8.

- a) No.
- b) No.
  - 1. Not applicable.
  - 2. No.
  - 3. No.
- c) No.
- d) No.

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e) No.

f) No.

g) Yes.

1. A total of five or six telephone conversations.

2. To set up meetings with key Jewish political leaders for their support and fundraising assistance.

h) No.

9. Yes.

a) April 7, 1983.

b) The purpose of my appearance was to discuss my reasons for challenging Senator Percy in the GOP primary election.

c) Arrangements for this meeting were made by Morris Amitay and Martha Kaufman.

1. I was contacted by telephone by Martha Kaufman. There was subsequent confirmation of the time and place by Ken Toltz of Washington PAC.

2. Morris Amitay was present; Michael Goland was not present.

3. My reasons for challenging Senator Percy.

4. No.

10. Yes.

a) April 14, 1983 in my office at 2447 Rayburn House Office Building.

1. Morris Amitay and myself.

2. To discuss United States-Israel relations and my differences with Senator Percy on issues affecting United States-Israel relations. Mr. Amitay interviewed me for the purpose of publishing my remarks in a newsletter which he edited.

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3. The substance of the interview was the historical perspective that ties the United States and Israel together, current United States-Israel problems, and the differences between Senator Percy and me on these points.

4. No.

12.

Yes.

a)

1. I do not know. Jerry Benjamin of AB Data, who ran my direct mail fundraising program, made this decision.
2. I do not know. See my answer to question 12(a) (1).
3. April 14, 1983 in my office at 2447 Rayburn House Office Building.
4. I do not know. See my answer to question 12(a) (1).
5. I do not know. See my answer to question 12(a) (1).
6. I do not know. See my answer to question 12(a) (1).

13.

No.

a) Not Applicable.

b)

1. No.

2. No.

a. Not Applicable.

b. Not Applicable.

c. No.

d. No.

95040511573

14.

1. No.

2. No.

3. No.

4. No.

5. No.

15. Not Applicable.

16. Yes.

a) I first learned about Mr. Goland's advertising program against Senator Percy while watching an evening television news program on Channel 9 in Chicago. The date was March 9, 1984. This story was amplified in later news accounts, and, of course, I was asked by many news reporters to give my reaction to Goland's "chameleon" commercial and his subsequent mailings. I told them that I thought it was outrageous, ineffective and in poor taste. I also believed then and now that this television commercial was counter-productive to my campaign.

17. No.

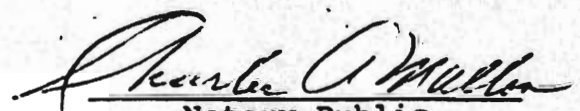
a) Not Applicable.

b) No.

c) Not Applicable.

  
Thomas Corcoran

Subscribed and sworn to before me this 29<sup>th</sup> day of  
October, 1984.

  
Notary Public

Charles A. Mallon  
Notary Public, Dist. of Columbia  
Comm. Exp. Sept. 30, 1986

35040511574

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Ms. Lee Ann Elliott  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

BY MESSENGER

Corcoran for  
ate Committee  
Box 2667  
bra, Illinois 60507

3 5 0 4 0 5 1 1 5 7 6

GENERAL COUNSEL

34 NOV 1 P 5:46

Wm. F. Keck  
P. O. Box 2667  
Aurora, IL 60507



Ms. Lee Ann Elliott  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 20, 1984

William F. Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 281  
Maple Avenue  
Sugar Grove, Illinois 60554

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Mr. Keck:

This is to advise you that after an investigation was conducted, the Commission concluded on December 18, 1984, that there is no probable cause to believe that the Corcoran for Senate Committee and you, as treasurer, violated the Act. Accordingly the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Stetle  
General Counsel

cc: The Honorable Tom Corcoran  
8736 Old Dominion Drive  
McLean, Virginia 22102

35040511577



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Daniel Swillinger, Esq.  
David & Gooch  
920 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

Re: MUR 1684

Dear Mr. Swillinger:

This is in reference to the complaint you filed with the Commission on April 26, 1984, concerning alleged violations of the Act by Michael Goland and the Corcoran for Senate Committee.

Based on your complaint, the Commission determined there was reason to believe that Michael Goland and the Corcoran for Senate Committee violated 2 U.S.C. §§ 441a(a) and 441a(f) respectively, of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter. After an investigation was conducted, and the brief of the General Counsel was considered, the Commission concluded on December , 1984, that there was no probable cause to believe that Michael Goland or the Corcoran for Senate Committee violated the Act. Accordingly, the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at 523-4000.

Sincerely,

*Handwritten signature: [Signature] 12/19/84*

Charles N. Steele  
General Counsel

35040511578



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Michael Goland  
Morris Amitay

Dear Mr. Ifshin:

This is to advise you that after an investigation was conducted, the Commission concluded on December , 1984, that there is no probable cause to believe your clients violated the Act. Accordingly the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

*[Handwritten signature]* 12/19/84

Charles N. Steele  
General Counsel

35040511579



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

William F. Keck, Treasurer  
Corcoran for Senate Committee  
P.O. Box 281  
Maple Avenue  
Sugar Grove, Illinois 60554

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Mr. Keck:

This is to advise you that after an investigation was conducted, the Commission concluded on December , 1984, that there is no probable cause to believe that the Corcoran for Senate Committee and you, as treasurer, violated the Act. Accordingly the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

cc: The Honorable Tom Corcoran  
8736 Old Dominion Drive  
McLean, Virginia 22102

35040511580



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Re: MUR 1684  
Michael Goland  
Morris Amitay

Dear Mr. Ifshin:

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If you have any questions, contact Duane A. Brown the attorney assigned this matter at (202)523-4000.

Sincerely,

Charles N. Steele  
General Counsel

35040511581



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

Daniel Swillinger, Esq.  
David & Gooch  
920 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

Re: MUR 1684

Dear Mr. Swillinger:

This is in reference to the complaint you filed with the Commission on April 26, 1984, concerning alleged violations of the Act by Michael Goland and the Corcoran for Senate Committee.

Based on your complaint, the Commission determined there was reason to believe that Michael Goland and the Corcoran for Senate Committee violated 2 U.S.C. §§ 441a(a) and 441a(f) respectively, of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter. After an investigation was conducted, and the brief of the General Counsel was considered, the Commission concluded on December , 1984, that there was no probable cause to believe that Michael Goland or the Corcoran for Senate Committee violated the Act. Accordingly, the file in this matter, numbered MUR 1684, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a) (8).

If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

35040511582

Corcoran for Senate  
P. O. Box 2667  
Aurora, IL 60507



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

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B4 DEC 10 10:38

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PHELPS, ROTHENBERG & TUNNEY

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

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

WASHINGTON

NOV 21 1984

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**FROM :**

**MANATT, PHELPS, ROTHENBERG & TUNNEY**

**Attorneys at Law**

**Sum 200**

1200 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

WASHINGTON, D.C. 20036

**TO :**

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

GCC#-5508

MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

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(415) 981-7540

LOS ANGELES (DOWNTOWN)

811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-5500

November 5, 1984

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

Dear Mr. Gross:

Please find enclosed the responses of Michael Goland and Morris Amitay to the Interrogatories submitted by the Commission. Unfortunately, Mr. Goland's father passed away this past Saturday and he has been unable to execute a signed copy in time for filing today. He has informed me by telephone this morning that he has received and approved the answers as submitted herewith and will execute the original. The responses will be returned to me by courier today and filed with the Commission upon receipt by my office. Mr. Amitay's executed responses are enclosed.

As I discussed with you and Mr. Steele upon service of the Interrogatories, there are a number of inquiries calling for responses irrelevant to this matter and that are unduly intrusive into the personal and private affairs of Mr. Amitay and Mr. Goland. For example, inquiries into the identity of a respondent or witness' friends and who they see socially are clearly beyond the scope of authority granted

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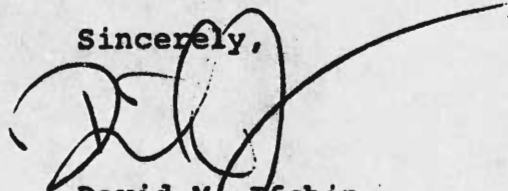
11/05/84 14:33

MANATT, PHELPS, ROTHENBERG & TUNNEY

Kenneth Gross  
Page 2  
November 5, 1984

the Commission by Congress, or, indeed, could be granted to any Federal regulatory agency. Nonetheless, in order to permit a prompt resolution of this matter, we have attempted to answer these inquiries within the bounds of reason.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David M. Lifshin', with a long horizontal flourish extending to the right.

David M. Lifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak  
Enclosures

85040511587

BEFORE THE FEDERAL ELECTION COMMISSION

MORRIS AMITAY

MUR 1684

RESPONSE TO INTERROGATORIES

- (1) Have you ever been a member of Washington PAC?

ANSWER: Yes.

- (a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

ANSWER: Founder and treasurer since November 1980.

- (b) Describe the circumstances of how you came to know of Washington PAC.

ANSWER: Not applicable.

- (c) State the purpose of Washington PAC.

ANSWER: To make contributions to congressional candidates who support credible U.S. foreign and defense policies.

- (2) Were you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: Yes.

- (a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

ANSWER: From newspaper accounts. I do not recall the dates.

- (b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

ANSWER: I did not make any personal contributions to the Corcoran campaign.

- (c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: I recommended to the Washington PAC Advisory Board that PAC contributions be made. I also probably made supportive statements in newsletter columns and conversations but never solicited contributions.

35040511588

- (d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

ANSWER: No.

- (3) Do you know Tom Corcoran?

ANSWER: Yes.

- (a) If so, please state how and when you met Mr. Corcoran.

ANSWER: To my best recollection, I met Mr. Corcoran in late 1982 after hearing that he had expressed an interest in running for the Senate. I do not recall exactly when since I attend numerous fundraising events in Washington, visit frequently on Capitol Hill where my office is located. During these activities, I meet many Congressmen informally and by chance. I did have a formal meeting with him for my interview in the Spring 1983 for my news column and I did see him at events I attended around that time. None of the events were either sponsored by him or held for his benefit.

- (b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

ANSWER: To my best recollection, the encounters described above occurred prior to Mr. Corcoran's candidacy. I had no "relationship" with him during his candidacy other than as described in response to numbers (3)(d) and (5).

- (1) Were the two of you personal friends at the time?

ANSWER: We object to questions (3)(b)(1) and (2) to the extent that these questions seek information beyond the scope of the Commission's investigation and seek irrelevant personal information.

- (2) Did you see him socially?

- (a) If so, how often on the average?

- (c) Describe your relationship with the [sic] Mr. Corcoran at present.

ANSWER: I have not met with him for at least a year except for a chance encounter in a congressional building a few months ago.

35040511589

(1) Do you see him socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(d) When and where was the last occasion you spoke with Mr. Corcoran?

ANSWER: We exchanged greetings in the U.S. Capitol corridor about two months ago.

(1) On that occasion, what was the substance of your conversation?

ANSWER: Nothing relevant to the subject matter of this MUR.

(2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?

ANSWER: No.

(a) If so, what was the substance of your conversation(s)?

(4) Did you ever have business dealings with Mr. Corcoran?

ANSWER: No.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for this purpose during such dealings?

(5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?

ANSWER: Yes, but to the best of my recollection not after he declared his candidacy. These conversations were related to his appearance before the PAC and to notify him of forthcoming PAC contributions.

(a) If so, how often on the average?

ANSWER: Approximately three times.

35040511590

(6) Do you know Michael Goland?

ANSWER: Yes.

(a) If so, state how and when you met Mr. Goland.

ANSWER: To the best of my recollection it was in 1981 at a charitable event.

(b) Describe your relationship with Mr. Goland.

ANSWER: Our first meetings were in the context of events such as the one described above. I was later retained by Mr. Goland to perform legal services, assist on real estate investments and to provide information on issues of interest to him.

(1) Do you see each other socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw of or spoke with Mr. Goland?

ANSWER: We spoke by phone last week.

(a) On that occasion, what was the substance of your discussion?

ANSWER: General political discussion on issues such as California Prop. 39. Nothing relevant to the subject matter of this MUR.

(b) Have you discussed this investigation with Mr. Goland?

ANSWER: Yes.

(1) If so, what was the substance of your conversation(s).

ANSWER: I advised him to retain special counsel when the complaint was first filed and to gather all relevant information.

35040511591

(7) Did you ever have business dealings with Mr. Goland?

ANSWER: Yes.

(a) If so, describe in detail the nature of your business dealings and state when they occurred?

ANSWER: See response to 6(b).

(b) How often did you see him for this purpose during such dealings?

ANSWER: I met with him periodically when visiting other clients or speaking at gatherings on the West Coast and in D.C. I cannot recall the precise number of times.

(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

ANSWER: Yes.

(a) If so, how often on the average?

ANSWER: Possibly about twice a month.

(b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

ANSWER: No, however, we did speak about Sen. Percy's record on foreign policy issues. We may also have discussed results of various polls relating to Percy's election.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

ANSWER: Yes.

(a) If so, when did the presentation(s) and viewing(s) occur?

ANSWER: April 6, 1983.

(b) What was the substance of the presentations? Was campaign strategy discussed?

ANSWER: The views of the candidate on foreign policy and defense issues. No specific campaign strategy was discussed other than references which were made by the candidate that he could beat Percy and that he needed funds to do so.

35040511592

- (1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?

ANSWER: I probably spoke to him after his presentation to thank him for coming.

- (a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.

ANSWER: It was probably a very brief thank you because another speaker spoke that day as well.

- (b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.

ANSWER: As Treasurer, I am in charge of making all arrangements for the regular luncheon meetings.

- (a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

ANSWER: Yes. A confirmation letter is routinely sent.

- (10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

ANSWER: No, other than his statement at the PAC luncheon in which he stated that he believed he could win the race.

- (1) If so, when?

- (2) Describe the substance of each such discussion and communication.

- (11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

ANSWER: No. Mr. Corcoran never requested my assistance. He did request financial assistance from Washington PAC.

35040511593

- (a) If so, describe what kind of assistance you provided as a result of the request.

ANSWER: I transmitted five PAC contributions between January 20, 1983 and January 25, 1984, to the Corcoran campaign. This is the usual contribution pattern for sending Washington PAC contributions tied to specific fundraising events. To the best of my recollection, I also sent Mr. Corcoran by mail, a brief summary of Senator Percy's public positions on the Middle East. The summary was prepared and published by an organization unrelated to Washington PAC and is publicly available on request.

- (12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

ANSWER: No, other than the PAC financial assistance as outlined above.

- (a) If so, what suggestions or strategies did you discuss with him?

- (b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

ANSWER: No.

- (13) Have you and Mr. Goland ever discussed the Percy campaign?

ANSWER: Yes.

- (a) If so, when and where did these discussions take place?

ANSWER: We sporadically discussed that campaign as well as others in the course of our legal and business dealings.

- (b) Describe the content and substance of the discussions.

ANSWER: I informed Mr. Goland of the progress of a number of races as discussed in the PAC newsletter, copies of which were attached to my response.

- (14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

ANSWER: Yes.

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- (a) If so, what was the substance of the advice requested by Mr. Goland?

ANSWER: The advice requested was limited to guidance under the FECA and thus is subject to the attorney client privilege.

- (b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

ANSWER: The advice is subject to the attorney client privilege.

- (15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

ANSWER: No.

- (a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?

- (b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.

- (c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?

- (d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?

- (e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

- (16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

ANSWER: This question assumes incorrectly that I was giving Mr. Goland advice on the campaign. On the contrary, as stated above, I was providing legal advice to Mr. Goland. Therefore, I never had any such conversations with Mr. Corcoran. On one occasion, after I became aware of Mr. Goland's independent expenditures, I received a phone call from a woman whose name I do not recall who identified herself as from Mr. Corcoran's office. I informed her at that time that I would not talk to her--before she indicated the purpose of the call--because a client of mine was making independent expenditures in the Senate race.

35040511595

- (a) If so, what was the substance of the discussion or communication regarding this advice?
- (b) When did such discussions or communications with Mr. Corcoran occur?

(17) Did you ever interview Mr. Corcoran?

ANSWER: Yes, on one occasion.

(a) For each such interview state:

- (1) The date and location of the interview.

ANSWER: I do not recall the exact date. I believe it was in March or April 1983. It took place in his office.

- (2) Who was present at the interview?

ANSWER: Mr. Corcoran and some aides whose names I do not recall.

- (3) The purpose of the interview?

ANSWER: As stated in my response to the complaint, the purpose of the interview was to obtain information about Mr. Corcoran's positions for the PAC newsletter and my column.

- (4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.

ANSWER: I requested the interview for the above reasons. There was no "interview script." I asked him questions relevant to the issues addressed in the column and newsletter. Mr. Corcoran had no input.

- (5) The content and substance of each interview.

ANSWER: The interview was on his views on foreign policy.

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- (1) Was the subject of the Corcoran campaign discussed?

ANSWER: The Corcoran campaign was not discussed except that Corcoran stated that he believed he could win because of Republican disaffection with Senator Percy.

- (a) If so, describe what about the Corcoran campaign was discussed during the interview.

ANSWER: See above.

- (18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

ANSWER: Yes, a friend of mine in Illinois sent me a copy he had received.

- (a) If so, for each such brochure ANSWER the following:

- (1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?

ANSWER: I don't recall the date. I believe it may have been July or August 1983.

- (2) Did you voluntarily appear in the picture on the fundraising brochure?

ANSWER: While I was interviewing Mr. Corcoran, he asked if I minded having my picture taken. I have frequently had my picture taken with Members of Congress, so I consented. I had no idea at the time that it was for the purpose of using in a campaign brochure.

- (3) By what procedure were you selected to appear on the fundraising brochure?

ANSWER: I have no idea.

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- (4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?

ANSWER: After the interview was published, I was asked if I minded if a portion of it appeared in a brochure. I do not recall the name of the person who asked.

- (5) When and where was the picture used in the brochure taken?

ANSWER: At the time of the interview.

- (6) For what purpose did your picture appear on the brochure?

ANSWER: It was not disclosed to me at the time.

- (7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?

ANSWER: I have no idea.

- (8) Did you assist or have any input into the development of the brochure?

ANSWER: No.

- (19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: No.

(a) If so, when and in what capacity were you working?

(b) How long did you work in each such capacity?

- (20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: I did not conduct or arrange any fundraisers for Mr. Corcoran. I do not recall precisely, but I may have attended one event following the making of a PAC contribution.

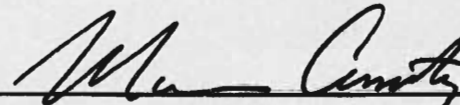
35040511598

Morris Amitay  
MUR 1684  
Response to Interrogatories  
Page 12

- (a) For each such fundraiser, state when and where it occurred.

ANSWER: I do not recall the date or place except that, to the best of my recollection, it may have been in the spring of 1983 and that it was held in Washington, D.C.

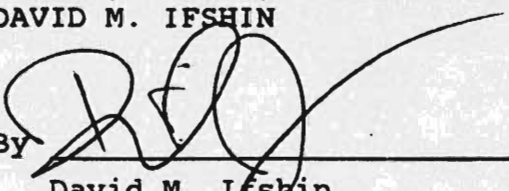
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

  
Morris Amitay 11-5-84

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By

  
David M. Ifshin  
Attorney for Morris Amitay

Date: November 5, 1984

85040511599

BEFORE THE FEDERAL ELECTION COMMISSION

MICHAEL GOLAND

MUR 1684

RESPONSE TO INTERROGATORIES

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

ANSWER: 505 North Lakeshore Drive  
Apartment #4009  
Chicago, Illinois 60611

Self-Employed Businessman  
20221 Prairie Street  
Chatsworth, California 90311

12 years

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

ANSWER: Sometime late in 1983.

a) State whether the funds used to make the expenditures were personal funds.

ANSWER: Yes.

b) State whether you received contributions from others in support of your effort.

ANSWER: I did not.

(1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

ANSWER: I was neither so counselled, encouraged and/or advised.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

ANSWER: Self-interest.

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(a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: I do not recall exactly when I became aware of Mr. Corcoran's decision to run. At no time did that decision have any bearing on my decision to make expenditures against Mr. Percy.

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

ANSWER: To the best of my recollection, I read it in the newspaper. I do not recall the date.

(6) Did you contribute any funds in support of the Corcoran campaign?

ANSWER: No.

- (a) If so, when and in what amount(s)?  
(b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: No.

- (c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

ANSWER: No.

(7) Do you know Tom Corcoran?

ANSWER: I have never met or spoken to Tom Corcoran or anyone on his congressional or campaign staff.

- (a) If so, please state when and how you met Mr. Corcoran.  
(b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

ANSWER: I had never heard of him.

- (1) Did you see him socially?  
(a) If so, how often on the average?

ANSWER: We object to question (7)(b)(1)(a) to the extent that this question seeks information beyond the scope of the Commission's investigation and

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seeks irrelevant personal information.

(c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.

(1) Have you seen him socially?

(a) If so, how often on the average?

ANSWER: We object to question (7)(c)(1) to the extent that this question seeks information beyond the scope of the Commission's investigation and seeks irrelevant personal information.

(d) When and where was the last occasion you spoke with Mr. Corcoran?

(1) State the substance of your conversation.

(2) State whether you have discussed this investigation with Mr. Corcoran.

(a) If so, state the substance of each such conversation, when it occurred and who else was present.

ANSWER: I have never met or spoken with Mr. Corcoran or to anyone on his campaign or congressional staffs.

(8) State whether you have ever had business dealings with Mr. Corcoran.

ANSWER: I have not.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

ANSWER: No.

(a) If so, how often - on the average?

(b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

(a) If so, list the dates of your membership.

(1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.

(2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

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- (b) Describe the circumstances of how you came to know of Washington PAC?

ANSWER: When the Washington Political Action Committee was first formed, I contributed to it at the suggestion of Morris Amitay. Mr. Amitay informed me of the formation of the PAC and requested my participation and financial support. I also agreed to let my name be used as part of the advisory board. I have never attended a meeting of the Washington PAC nor have I ever been a part of any policy discussions, meetings or other processes. I have never participated in any of the decisions or expenditures made by the Washington PAC; my advice has neither been requested nor given. My relationship with the Washington PAC ended in June, 1983.

- (11) Did you ever speak with Tom Corcoran at the PAC's offices?  
For each conversation state:

ANSWER: No.

- (a) When you spoke with Mr. Corcoran.
- (b) Whether it was face-to-face or by telephone.
- (c) The nature of the discussion.
- (d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- (e) Whether you had begun to make expenditures against Senator Percy's campaign.
- (f) Whether you had made any contributions to the Corcoran campaign.

- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

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(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

ANSWER: No.

(a) If so, describe what assistance you provided his campaign.

(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

ANSWER: No.

(a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

ANSWER: No.

(a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

ANSWER: To the best of my recollection, I first met Mr. Amitay at a cocktail party in March, 1981, in Washington. While it is possible that I may have met him on a prior occasion, I have no specific recollection.

(a) Describe your relationship with Mr. Amitay.

ANSWER: Mr. Amitay is one of my attorneys. My only relationship with Mr. Amitay in regard to my activities in the 1984 Illinois Senatorial Campaign was that he advised me on compliance with the Federal Election Campaign Act and reporting procedures for independent expenditures.

(1) Do you see each other socially?

ANSWER: Same objection as to question (7) (b) (1) (a).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Amitay?

ANSWER: We speak periodically by telephone. I last spoke

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with Mr. Amitay last week.

- (a) On that occasion, what was the substance of your discussion?

ANSWER: It did not pertain to any matter relevant to the 1984 Illinois Senate race or any other matter relevant to this MUR.

- (3) Have you discussed this investigation with Mr. Amitay?

ANSWER: No, other than a brief conversation after the complaint was filed regarding the necessity for legal representation.

- (a) If so, when and what was the substance of your conversation(s)?

- (18) Did you ever have business dealings with Mr. Amitay?

ANSWER: None outside our retainer agreement.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred?  
(b) How often did you speak to him for business purposes during such dealings?

- (19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

- (a) If so, how often - on the average?  
(b) When was the last time you spoke with Mr. Amitay by telephone?

- (1) What was the subject and purpose of your discussion?

ANSWER: My only discussions with Mr. Amitay by telephone or other means regarding my independent expenditures in the 1984 Senatorial campaign were in the course of legal advice given me by Mr. Amitay on compliance with the Federal Election Campaign Act in regard to my independent expenditures.

- (20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

ANSWER: No.

- (a) If so, when did the presentation(s) occur?  
(1) Did you ever speak with Tom Corcoran following his presentation?

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(a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran?

ANSWER: No.

If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

ANSWER: No.

- (a) If so, list the date(s) of the interview(s).
- (b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?
- (c) What input did you have in the coordinating or arranging of the interview(s)?
- (d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

ANSWER: No.

If so, for each such discussion state:

- (a) When and where the discussion took place.
- (b) The substance of the discussion.
- (c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- (a) If so, when and where did these discussions take place?
- (b) Describe the content and substance of each such discussion.

ANSWER: Mr. Amitay provided me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures. He also provided me with some information on Percy's voting record.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

ANSWER: As noted previously, the only significant involvement of Mr. Amitay in this matter was to provide me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures.

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(a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

ANSWER: No.

(a) If so, for each occasion on which such advice was given state:

- (1) the date the advice was given.
- (2) the substance of the advice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

\_\_\_\_\_  
Michael Goland

Respectfully submitted as to objections,

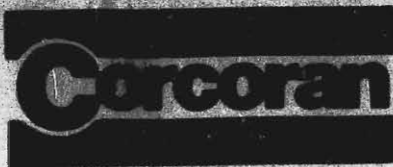
MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By \_\_\_\_\_

David M. Ifshin  
Attorney for Michael Goland

Date: \_\_\_\_\_

85040511607



CORCORAN FOR SENATE COMMITTEE

P. O. BOX 2867 • AURORA, ILLINOIS 60507

RECEIVED AT THE FED  
GCC #5304  
84 OCT 25 AM 11:04

October 24, 1984

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

Dear Mr. Brown:

Pursuant to our conversation this afternoon, I am writing to request that the time period be extended to October 31, 1984 for my response and the response of the Treasurer of the Corcoran for Senate Committee to your FEC letters of October 5.

There was some delay in getting these FEC letters to the attention of Mr. Keck and me because they were sent to Illinois first and then to me in Washington. Furthermore, Mr. Keck, a Certified Public Accountant, has been on assignment in Louisiana.

I talked with Mr. Keck today in Louisiana, and I know that he will be able to comply with this deadline. Furthermore, I regret the delay in my response, but assure you that I will also be able to comply with a deadline of October 31.

Thanking you in advance for your cooperation, I am

Sincerely,

Tom Corcoran  
Representative in Congress

cc: Mr. William Keck

RECEIVED  
GENERAL COUNSEL  
34 OCT 25 PM 1:54

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8 5 7 4 0 1 6 0 9

Corcoran  
2447 Rayburn Building  
Washington, D.C. 20515



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

84 OCT 25 AM 54

FEC



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

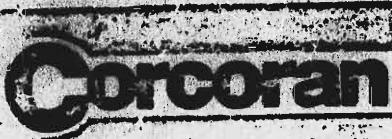
DATE: OCTOBER 4, 1984

SUBJECT: MUR 1684 - Orders to Submit Written  
Answers

The attached orders, which were Commission approved on October 2, 1984 by a vote of 4-1, have been signed and sealed this date.

Attachment

35040511610



CORCORAN FOR SENATE COMMITTEE

P. O. BOX 2667 • AURORA, ILLINOIS 60507

OGC # 5448

REC  
FEC  
COPY

94 OCT 30 P 5: 15

October 29, 1984

Ms. Lee Ann Elliott,  
Chairman  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

34 NOV 1

P 5: 31

RECEIVED

Re: MUR 1684  
Corcoran for Senate Committee  
William F. Keck, as Treasurer

Dear Madame Chairman:

This letter responds to your letter dated October 5, 1984 in furtherance of the investigation of the above-captioned matter. I am enclosing my answers to the questions contained in the Interrogatories.

Sincerely,

Tom Corcoran  
Representative in Congress

Enclosure

85040511611

BEFORE THE FEDERAL ELECTION COMMISSION  
OF THE UNITED STATES OF AMERICA

IN THE MATTER OF  
CORCORAN FOR SENATE  
COMMITTEE, et al.

)  
)  
)  
MATTER UNDER REVIEW 1684

RESPONSE OF THE HONORABLE THOMAS CORCORAN  
TO THE INTERROGATORIES POSED TO HIM BY  
THE FEDERAL ELECTION COMMISSION

1. 3:00 p.m., December 13, 1982.
2. During the week of December 5, 1982, I received a telephone call from Paul Weyrich, who said that he had seen Morris Amitay in an airport that day. Amitay had asked him if he knew whether, or not the rumors about Congressman Tom Corcoran challenging Senator Percy in the 1984 GOP Primary were true. Weyrich answered that he had had a couple of conversations with Corcoran, and he thought he was pretty serious about challenging Percy. Amitay then asked if Weyrich would find out if Corcoran were willing to meet with him. I agreed to the meeting with Amitay.  
  
Based on that telephone call with Weyrich, a meeting was arranged involving me and Morris Amitay, on December 13, 1982. That was the first meeting with Morris Amitay. We had never met before that time.
3. After the primary election campaign had ended, I saw Morris Amitay in the Rayburn House Office Building outside the Energy and Commerce Committee hearing room (Room 2123) as I was walking to a public meeting of that Committee, of which I am a member. We shook hands, and I asked what brought him to the Committee hearing. He said a bill in which he had an interest for a client. Regarding the Percy FEC complaint, I said that it was my observation that in matters like this, it is usually the loser who complains about the winner, not vice versa. We laughed and parted. Nothing else was said.
4. No.

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5. Yes .

- a) Five or six times total.
- b) I cannot recall the date of my last conversation with Mr. Amitay.
  - 1. I do not recall the subject and purpose of my last conversation with Mr. Amitay.

6.

In my meeting with Morris Amitay on December 13, 1982, he advised me that he had organized a political action committee, although I do not recall that he identified it by name.

- a) I understand that the purpose of the Washington PAC was to raise and expend monies on behalf of candidates who support better United States-Israel relations.
- b) I have never been a member of Washington PAC.
- c) Yes.
  - 1. Morris Amitay. My meeting with Amitay on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983. See answer, question 9.

d) No.

7. Yes.

- a) During my meeting with him on December 13, 1982 and my appearance before the Washington PAC board members on April 7, 1983.
- b) Not Applicable.

8.

- a) No.
- b) No.
  - 1. Not applicable.
  - 2. No.
  - 3. No.
- c) No.
- d) No.

85040511613

e) No.

f) No.

g) Yes.

1. A total of five or six telephone conversations.

2. To set up meetings with key Jewish political leaders for their support and fundraising assistance.

h) No.

9. Yes.

a) April 7, 1983.

b) The purpose of my appearance was to discuss my reasons for challenging Senator Percy in the GOP primary election.

c) Arrangements for this meeting were made by Morris Amitay and Martha Kaufman.

1. I was contacted by telephone by Martha Kaufman. There was subsequent confirmation of the time and place by Ken Toltz of Washington PAC.

2. Morris Amitay was present; Michael Goland was not present.

3. My reasons for challenging Senator Percy.

4. No.

10. Yes.

a) April 14, 1983 in my office at 2447 Rayburn House Office Building.

1. Morris Amitay and myself.

2. To discuss United States-Israel relations and my differences with Senator Percy on issues affecting United States-Israel relations. Mr. Amitay interviewed me for the purpose of publishing my remarks in a newsletter which he edited.

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3. The substance of the interview was the historical perspective that ties the United States and Israel together, current United States-Israel problems, and the differences between Senator Percy and me on these points.

4. No.

12. Yes.

a)

1. I do not know. Jerry Benjamin of AB Data, who ran my direct mail fundraising program, made this decision.

2. I do not know. See my answer to question 12(a)(1).

3. April 14, 1983 in my office at 2447 Rayburn House Office Building.

4. I do not know. See my answer to question 12(a)(1).

5. I do not know. See my answer to question 12(a)(1).

6. I do not know. See my answer to question 12(a)(1).

13. No.

a) Not Applicable.

b)

1. No.

2. No.

a. Not Applicable.

b. Not Applicable.

c. No.

d. No.

85040511615

14.

1. No.

2. No.

3. No.

4. No.

5. No.

15. Not Applicable.

16. Yes.

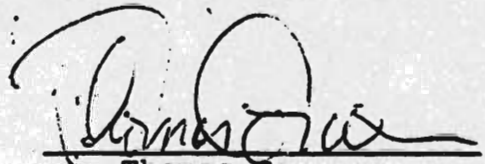
a) I first learned about Mr. Goland's advertising program against Senator Percy while watching an evening television news program on Channel 9 in Chicago. The date was March 9, 1984. This story was amplified in later news accounts, and, of course, I was asked by many news reporters to give my reaction to Goland's "chameleon" commercial and his subsequent mailings. I told them that I thought it was outrageous, ineffective and in poor taste. I also believed then and now that this television commercial was counter-productive to my campaign.

17. No.

a) Not Applicable.

b) No.

c) Not Applicable.

  
Thomas Corcoran

Subscribed and sworn to before me this 29<sup>th</sup> day of  
October, 1984.

  
Notary Public

Charles E. Mallon  
Notary Public, Dist. of Columbia

85040511616

GEC #5314

MUR  
1684

**MANATT, PHELPS, ROTHENBERG & TUNNEY**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
**ATTORNEYS AT LAW**

1800 NEW HAMPSHIRE AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
TELEPHONE (202) 463-4300

**WESTSIDE OFFICE**  
11222 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CALIFORNIA 90064  
(213) 312-4000  
**SAN FRANCISCO OFFICE**  
FOUR EMBARKMENT CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 394-7240  
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October 26, 1984

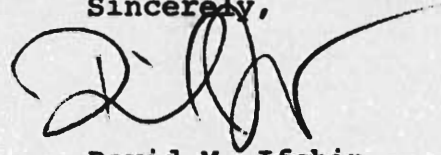
Kenneth Gross, Esq.  
Assistant General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
34 OCT 26 1984 3:49

Dear Mr. Gross:

This letter confirms our telephone conversation of this morning. Michael Goland's father is in the final stages of a terminal illness and is not expected to survive the week. As a consequence, Mr. Goland has not been sufficiently available to permit the completion of the responses to his interrogatories. An extension of an additional five days from October 29 to November 5, 1984, therefore, is necessary to insure the submission of complete and accurate responses to the interrogatories directed to Mr. Goland and Mr. Amitay.

Sincerely,



David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak

CC: Charles Steele

85040511617

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November 5, 1984

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

Dear Mr. Gross:

Please find enclosed the responses of Michael Goland and Morris Amitay to the Interrogatories submitted by the Commission. Unfortunately, Mr. Goland's father passed away this past Saturday and he has been unable to execute a signed copy in time for filing today. He has informed me by telephone this morning that he has received and approved the answers as submitted herewith and will execute the original. The responses will be returned to me by courier today and filed with the Commission upon receipt by my office. Mr. Amitay's executed responses are enclosed.

As I discussed with you and Mr. Steele upon service of the Interrogatories, there are a number of inquiries calling for responses irrelevant to this matter and that are unduly intrusive into the personal and private affairs of Mr. Amitay and Mr. Goland. For example, inquiries into the identity of a respondent or witness' friends and who they see socially are clearly beyond the scope of authority granted

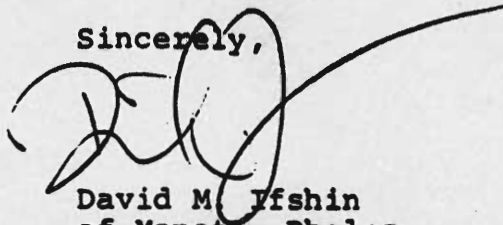
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MANATT, PHELPS, ROTHENBERG & TUNNEY

Kenneth Gross  
Page 2  
November 5, 1984

the Commission by Congress, or, indeed, could be granted to any Federal regulatory agency. Nonetheless, in order to permit a prompt resolution of this matter, we have attempted to answer these inquiries within the bounds of reason.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David M. Ifshin', is written over the word 'Sincerely,'. The signature is stylized with loops and a long horizontal stroke extending to the right.

David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:nak  
Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

MORRIS AMITAY

MUR 1684

RESPONSE TO INTERROGATORIES

- (1) Have you ever been a member of Washington PAC?

ANSWER: Yes.

- (a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

ANSWER: Founder and treasurer since November 1980.

- (b) Describe the circumstances of how you came to know of Washington PAC.

ANSWER: Not applicable.

- (c) State the purpose of Washington PAC.

ANSWER: To make contributions to congressional candidates who support credible U.S. foreign and defense policies.

- (2) Were you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: Yes.

- (a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

ANSWER: From newspaper accounts. I do not recall the dates.

- (b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

ANSWER: I did not make any personal contributions to the Corcoran campaign.

- (c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: I recommended to the Washington PAC Advisory Board that PAC contributions be made. I also probably made supportive statements in newsletter columns and conversations but never solicited contributions.

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- (d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

ANSWER: No.

- (3) Do you know Tom Corcoran?

ANSWER: Yes.

- (a) If so, please state how and when you met Mr. Corcoran.

ANSWER: To my best recollection, I met Mr. Corcoran in late 1982 after hearing that he had expressed an interest in running for the Senate. I do not recall exactly when since I attend numerous fundraising events in Washington, visit frequently on Capitol Hill where my office is located. During these activities, I meet many Congressmen informally and by chance. I did have a formal meeting with him for my interview in the Spring 1983 for my news column and I did see him at events I attended around that time. None of the events were either sponsored by him or held for his benefit.

- (b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

ANSWER: To my best recollection, the encounters described above occurred prior to Mr. Corcoran's candidacy. I had no "relationship" with him during his candidacy other than as described in response to numbers (3)(d) and (5).

- (1) Were the two of you personal friends at the time?

ANSWER: We object to questions (3)(b)(1) and (2) to the extent that these questions seek information beyond the scope of the Commission's investigation and seek irrelevant personal information.

- (2) Did you see him socially?

(a) If so, how often on the average?

- (c) Describe your relationship with the [sic] Mr. Corcoran at present.

ANSWER: I have not met with him for at least a year except for a chance encounter in a congressional building a few months ago.

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(1) Do you see him socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(d) When and where was the last occasion you spoke with Mr. Corcoran?

ANSWER: We exchanged greetings in the U.S. Capitol corridor about two months ago.

(1) On that occasion, what was the substance of your conversation?

ANSWER: Nothing relevant to the subject matter of this MUR.

(2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?

ANSWER: No.

(a) If so, what was the substance of your conversation(s)?

(4) Did you ever have business dealings with Mr. Corcoran?

ANSWER: No.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for this purpose during such dealings?

(5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?

ANSWER: Yes, but to the best of my recollection not after he declared his candidacy. These conversations were related to his appearance before the PAC and to notify him of forthcoming PAC contributions.

(a) If so, how often on the average?

ANSWER: Approximately three times.

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(6) Do you know Michael Goland?

ANSWER: Yes.

(a) If so, state how and when you met Mr. Goland.

ANSWER: To the best of my recollection it was in 1981 at a charitable event.

(b) Describe your relationship with Mr. Goland.

ANSWER: Our first meetings were in the context of events such as the one described above. I was later retained by Mr. Goland to perform legal services, assist on real estate investments and to provide information on issues of interest to him.

(1) Do you see each other socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Goland?

ANSWER: We spoke by phone last week.

(a) On that occasion, what was the substance of your discussion?

ANSWER: General political discussion on issues such as California Prop. 39. Nothing relevant to the subject matter of this MUR.

(b) Have you discussed this investigation with Mr. Goland?

ANSWER: Yes.

(1) If so, what was the substance of your conversation(s).

ANSWER: I advised him to retain special counsel when the complaint was first filed and to gather all relevant information.

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(7) Did you ever have business dealings with Mr. Goland?

ANSWER: Yes.

(a) If so, describe in detail the nature of your business dealings and state when they occurred?

ANSWER: See response to 6(b).

(b) How often did you see him for this purpose during such dealings?

ANSWER: I met with him periodically when visiting other clients or speaking at gatherings on the West Coast and in D.C. I cannot recall the precise number of times.

(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

ANSWER: Yes.

(a) If so, how often on the average?

ANSWER: Possibly about twice a month.

(b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

ANSWER: No, however, we did speak about Sen. Percy's record on foreign policy issues. We may also have discussed results of various polls relating to Percy's election.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

ANSWER: Yes.

(a) If so, when did the presentation(s) and viewing(s) occur?

ANSWER: April 6, 1983.

(b) What was the substance of the presentations? Was campaign strategy discussed?

ANSWER: The views of the candidate on foreign policy and defense issues. No specific campaign strategy was discussed other than references which were made by the candidate that he could beat Percy and that he needed funds to do so.

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- (1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?

ANSWER: I probably spoke to him after his presentation to thank him for coming.

- (a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.

ANSWER: It was probably a very brief thank you because another speaker spoke that day as well.

- (b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.

ANSWER: As Treasurer, I am in charge of making all arrangements for the regular luncheon meetings.

- (a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

ANSWER: Yes. A confirmation letter is routinely sent.

- (10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

ANSWER: No, other than his statement at the PAC luncheon in which he stated that he believed he could win the race.

- (1) If so, when?

- (2) Describe the substance of each such discussion and communication.

- (11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

ANSWER: No. Mr. Corcoran never requested my assistance. He did request financial assistance from Washington PAC.

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- (a) If so, describe what kind of assistance you provided as a result of the request.

ANSWER: I transmitted five PAC contributions between January 20, 1983 and January 25, 1984, to the Corcoran campaign. This is the usual contribution pattern for sending Washington PAC contributions tied to specific fundraising events. To the best of my recollection, I also sent Mr. Corcoran by mail, a brief summary of Senator Percy's public positions on the Middle East. The summary was prepared and published by an organization unrelated to Washington PAC and is publicly available on request.

- (12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

ANSWER: No, other than the PAC financial assistance as outlined above.

- (a) If so, what suggestions or strategies did you discuss with him?

- (b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

ANSWER: No.

- (13) Have you and Mr. Goland ever discussed the Percy campaign?

ANSWER: Yes.

- (a) If so, when and where did these discussions take place?

ANSWER: We sporadically discussed that campaign as well as others in the course of our legal and business dealings.

- (b) Describe the content and substance of the discussions.

ANSWER: I informed Mr. Goland of the progress of a number of races as discussed in the PAC newsletter, copies of which were attached to my response.

- (14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

ANSWER: Yes.

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- (a) If so, what was the substance of the advice requested by Mr. Goland?

ANSWER: The advice requested was limited to guidance under the FECA and thus is subject to the attorney client privilege.

- (b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

ANSWER: The advice is subject to the attorney client privilege.

- (15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

ANSWER: No.

- (a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?

- (b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.

- (c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?

- (d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?

- (e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

- (16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

ANSWER: This question assumes incorrectly that I was giving Mr. Goland advice on the campaign. On the contrary, as stated above, I was providing legal advice to Mr. Goland. Therefore, I never had any such conversations with Mr. Corcoran. On one occasion, after I became aware of Mr. Goland's independent expenditures, I received a phone call from a woman whose name I do not recall who identified herself as from Mr. Corcoran's office. I informed her at that time that I would not talk to her--before she indicated the purpose of the call--because a client of mine was making independent expenditures in the Senate race.

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- (a) If so, what was the substance of the discussion or communication regarding this advice?
- (b) When did such discussions or communications with Mr. Corcoran occur?

(17) Did you ever interview Mr. Corcoran?

ANSWER: Yes, on one occasion.

(a) For each such interview state:

- (1) The date and location of the interview.

ANSWER: I do not recall the exact date. I believe it was in March or April 1983. It took place in his office.

- (2) Who was present at the interview?

ANSWER: Mr. Corcoran and some aides whose names I do not recall.

- (3) The purpose of the interview?

ANSWER: As stated in my response to the complaint, the purpose of the interview was to obtain information about Mr. Corcoran's positions for the PAC newsletter and my column.

- (4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.

ANSWER: I requested the interview for the above reasons. There was no "interview script." I asked him questions relevant to the issues addressed in the column and newsletter. Mr. Corcoran had no input.

- (5) The content and substance of each interview.

ANSWER: The interview was on his views on foreign policy.

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- (1) Was the subject of the Corcoran campaign discussed?

ANSWER: The Corcoran campaign was not discussed except that Corcoran stated that he believed he could win because of Republican disaffection with Senator Percy.

- (a) If so, describe what about the Corcoran campaign was discussed during the interview.

ANSWER: See above.

- (18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

ANSWER: Yes, a friend of mine in Illinois sent me a copy he had received.

- (a) If so, for each such brochure ANSWER the following:

- (1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?

ANSWER: I don't recall the date. I believe it may have been July or August 1983.

- (2) Did you voluntarily appear in the picture on the fundraising brochure?

ANSWER: While I was interviewing Mr. Corcoran, he asked if I minded having my picture taken. I have frequently had my picture taken with Members of Congress, so I consented. I had no idea at the time that it was for the purpose of using in a campaign brochure.

- (3) By what procedure were you selected to appear on the fundraising brochure?

ANSWER: I have no idea.

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- (4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?

ANSWER: After the interview was published, I was asked if I minded if a portion of it appeared in a brochure. I do not recall the name of the person who asked.

- (5) When and where was the picture used in the brochure taken?

ANSWER: At the time of the interview.

- (6) For what purpose did your picture appear on the brochure?

ANSWER: It was not disclosed to me at the time.

- (7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?

ANSWER: I have no idea.

- (8) Did you assist or have any input into the development of the brochure?

ANSWER: No.

- (19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: No.

- (a) If so, when and in what capacity were you working?

- (b) How long did you work in each such capacity?

- (20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: I did not conduct or arrange any fundraisers for Mr. Corcoran. I do not recall precisely, but I may have attended one event following the making of a PAC contribution.


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Morris Amitay  
MUR 1684  
Response to Interrogatories  
Page 12

(a) For each such fundraiser, state when and where it occurred.

ANSWER: I do not recall the date or place except that, to the best of my recollection, it may have been in the spring of 1983 and that it was held in Washington, D.C.

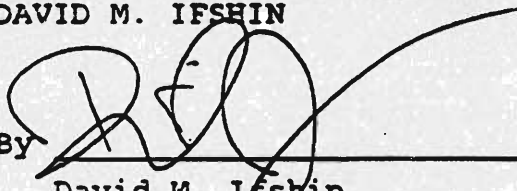
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

  
Morris Amitay 11-5-84

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By

  
David M. IFSHIN  
Attorney for Morris Amitay

Date: November 5, 1984

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BEFORE THE FEDERAL ELECTION COMMISSION

MICHAEL GOLAND

MUR 1684

RESPONSE TO INTERROGATORIES

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

ANSWER: 505 North Lakeshore Drive  
Apartment #4009  
Chicago, Illinois 60611

Self-Employed Businessman  
20221 Prairie Street  
Chatsworth, California 90311

12 years

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

ANSWER: Sometime late in 1983.

a) State whether the funds used to make the expenditures were personal funds.

ANSWER: Yes.

b) State whether you received contributions from others in support of your effort.

ANSWER: I did not.

(1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

ANSWER: I was neither so counselled, encouraged and/or advised.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

ANSWER: Self-interest.

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(a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: I do not recall exactly when I became aware of Mr. Corcoran's decision to run. At no time did that decision have any bearing on my decision to make expenditures against Mr. Percy.

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

ANSWER: To the best of my recollection, I read it in the newspaper. I do not recall the date.

(6) Did you contribute any funds in support of the Corcoran campaign?

ANSWER: No.

- (a) If so, when and in what amount(s)?
- (b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: No.

- (c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

ANSWER: No.

(7) Do you know Tom Corcoran?

ANSWER: I have never met or spoken to Tom Corcoran or anyone on his congressional or campaign staff.

- (a) If so, please state when and how you met Mr. Corcoran.
- (b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

ANSWER: I had never heard of him.

- (1) Did you see him socially?
  - (a) If so, how often on the average?

ANSWER: We object to question (7)(b)(1)(a) to the extent that this question seeks information beyond the scope of the Commission's investigation and

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seeks irrelevant personal information.

(c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.

(1) Have you seen him socially?

(a) If so, how often on the average?

ANSWER: We object to question (7) (c) (1) to the extent that this question seeks information beyond the scope of the Commission's investigation and seeks irrelevant personal information.

(d) When and where was the last occasion you spoke with Mr. Corcoran?

(1) State the substance of your conversation.

(2) State whether you have discussed this investigation with Mr. Corcoran.

(a) If so, state the substance of each such conversation, when it occurred and who else was present.

ANSWER: I have never met or spoken with Mr. Corcoran or to anyone on his campaign or congressional staffs.

(8) State whether you have ever had business dealings with Mr. Corcoran.

ANSWER: I have not.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

ANSWER: No.

(a) If so, how often - on the average?

(b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

(a) If so, list the dates of your membership.

(1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.

(2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

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- (b) Describe the circumstances of how you came to know of Washington PAC?

ANSWER: When the Washington Political Action Committee was first formed, I contributed to it at the suggestion of Morris Amitay. Mr. Amitay informed me of the formation of the PAC and requested my participation and financial support. I also agreed to let my name be used as part of the advisory board. I have never attended a meeting of the Washington PAC nor have I ever been a part of any policy discussions, meetings or other processes. I have never participated in any of the decisions or expenditures made by the Washington PAC; my advice has neither been requested nor given. My relationship with the Washington PAC ended in June, 1983.

- (11) Did you ever speak with Tom Corcoran at the PAC's offices? For each conversation state:

ANSWER: No.

- (a) When you spoke with Mr. Corcoran.
- (b) Whether it was face-to-face or by telephone.
- (c) The nature of the discussion.
- (d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- (e) Whether you had begun to make expenditures against Senator Percy's campaign.
- (f) Whether you had made any contributions to the Corcoran campaign.

- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

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(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

ANSWER: No.

(a) If so, describe what assistance you provided his campaign.

(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

ANSWER: No.

(a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

ANSWER: No.

(a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

ANSWER: To the best of my recollection, I first met Mr. Amitay at a cocktail party in March, 1981, in Washington. While it is possible that I may have met him on a prior occasion, I have no specific recollection.

(a) Describe your relationship with Mr. Amitay.

ANSWER: Mr. Amitay is one of my attorneys. My only relationship with Mr. Amitay in regard to my activities in the 1984 Illinois Senatorial Campaign was that he advised me on compliance with the Federal Election Campaign Act and reporting procedures for independent expenditures.

(1) Do you see each other socially?

ANSWER: Same objection as to question (7)(b)(1)(a).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Amitay?

ANSWER: We speak periodically by telephone. I last spoke

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with Mr. Amitay last week.

- (a) On that occasion, what was the substance of your discussion?

ANSWER: It did not pertain to any matter relevant to the 1984 Illinois Senate race or any other matter relevant to this MUR.

- (3) Have you discussed this investigation with Mr. Amitay?

ANSWER: No, other than a brief conversation after the complaint was filed regarding the necessity for legal representation.

- (a) If so, when and what was the substance of your conversation(s)?

- (18) Did you ever have business dealings with Mr. Amitay?

ANSWER: None outside our retainer agreement.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred?  
(b) How often did you speak to him for business purposes during such dealings?

- (19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

- (a) If so, how often - on the average?  
(b) When was the last time you spoke with Mr. Amitay by telephone?

- (1) What was the subject and purpose of your discussion?

ANSWER: My only discussions with Mr. Amitay by telephone or other means regarding my independent expenditures in the 1984 Senatorial campaign were in the course of legal advice given me by Mr. Amitay on compliance with the Federal Election Campaign Act in regard to my independent expenditures.

- (20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

ANSWER: No.

- (a) If so, when did the presentation(s) occur?  
(1) Did you ever speak with Tom Corcoran following his presentation?

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- (a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran?

ANSWER: No.

If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

ANSWER: No.

- (a) If so, list the date(s) of the interview(s).  
(b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?  
(c) What input did you have in the coordinating or arranging of the interview(s)?  
(d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

ANSWER: No.

If so, for each such discussion state:

- (a) When and where the discussion took place.  
(b) The substance of the discussion.  
(c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- (a) If so, when and where did these discussions take place?  
(b) Describe the content and substance of each such discussion.

ANSWER: Mr. Amitay provided me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures. He also provided me with some information on Percy's voting record.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

ANSWER: As noted previously, the only significant involvement of Mr. Amitay in this matter was to provide me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures.

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(a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

ANSWER: No.

(a) If so, for each occasion on which such advice was given state:

- (1) the date the advice was given.
- (2) the substance of the advice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

\_\_\_\_\_  
Michael Goland

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By \_\_\_\_\_  
David M. Ifshin  
Attorney for Michael Goland

Date: \_\_\_\_\_

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BEFORE THE FEDERAL ELECTION COMMISSION

MORRIS AMITAY

MUR 1684

RESPONSE TO INTERROGATORIES

- (1) Have you ever been a member of Washington PAC?

ANSWER: Yes.

- (a) If so, please detail your role within the organization, including the dates of your membership, all positions you have held within the organization and the dates you held such positions.

ANSWER: Founder and treasurer since November 1980.

- (b) Describe the circumstances of how you came to know of Washington PAC.

ANSWER: Not applicable.

- (c) State the purpose of Washington PAC.

ANSWER: To make contributions to congressional candidates who support credible U.S. foreign and defense policies.

- (2) Were you aware that Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: Yes.

- (a) When and how did you first become aware of the fact that Mr. Corcoran was running for the Senate?

ANSWER: From newspaper accounts. I do not recall the dates.

- (b) Did you contribute any funds in support of the Corcoran campaign? When, in what amount(s) and to whom?

ANSWER: I did not make any personal contributions to the Corcoran campaign.

- (c) Did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: I recommended to the Washington PAC Advisory Board that PAC contributions be made. I also probably made supportive statements in newsletter columns and conversations but never solicited contributions.

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- (d) Were you encouraged to contribute funds to the Corcoran campaign? If so, by whom?

ANSWER: No.

- (3) Do you know Tom Corcoran?

ANSWER: Yes.

- (a) If so, please state how and when you met Mr. Corcoran.

ANSWER: To my best recollection, I met Mr. Corcoran in late 1982 after hearing that he had expressed an interest in running for the Senate. I do not recall exactly when since I attend numerous fundraising events in Washington, visit frequently on Capitol Hill where my office is located. During these activities, I meet many Congressmen informally and by chance. I did have a formal meeting with him for my interview in the Spring 1983 for my news column and I did see him at events I attended around that time. None of the events were either sponsored by him or held for his benefit.

- (b) Describe your relationship with Mr. Corcoran during his candidacy for the Illinois Senate seat?

ANSWER: To my best recollection, the encounters described above occurred prior to Mr. Corcoran's candidacy. I had no "relationship" with him during his candidacy other than as described in response to numbers (3)(d) and (5).

- (1) Were the two of you personal friends at the time?

ANSWER: We object to questions (3)(b)(1) and (2) to the extent that these questions seek information beyond the scope of the Commission's investigation and seek irrelevant personal information.

- (2) Did you see him socially?

- (a) If so, how often on the average?

- (c) Describe your relationship with the [sic] Mr. Corcoran at present.

ANSWER: I have not met with him for at least a year except for a chance encounter in a congressional building a few months ago.

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(1) Do you see him socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(d) When and where was the last occasion you spoke with Mr. Corcoran?

ANSWER: We exchanged greetings in the U.S. Capitol corridor about two months ago.

(1) On that occasion, what was the substance of your conversation?

ANSWER: Nothing relevant to the subject matter of this MUR.

(2) Have you ever had the occasion to discuss this investigation with Mr. Corcoran?

ANSWER: No.

(a) If so, what was the substance of your conversation(s)?

(4) Did you ever have business dealings with Mr. Corcoran?

ANSWER: No.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for this purpose during such dealings?

(5) During the time he was running for U.S. Senate, did you speak to Mr. Corcoran by telephone?

ANSWER: Yes, but to the best of my recollection not after he declared his candidacy. These conversations were related to his appearance before the PAC and to notify him of forthcoming PAC contributions.

(a) If so, how often on the average?

ANSWER: Approximately three times.

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(6) Do you know Michael Goland?

ANSWER: Yes.

(a) If so, state how and when you met Mr. Goland.

ANSWER: To the best of my recollection it was in 1981 at a charitable event.

(b) Describe your relationship with Mr. Goland.

ANSWER: Our first meetings were in the context of events such as the one described above. I was later retained by Mr. Goland to perform legal services, assist on real estate investments and to provide information on issues of interest to him.

(1) Do you see each other socially?

ANSWER: Same objection as to (3)(b)(1) and (2).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Goland?

ANSWER: We spoke by phone last week.

(a) On that occasion, what was the substance of your discussion?

ANSWER: General political discussion on issues such as California Prop. 39. Nothing relevant to the subject matter of this MUR.

(b) Have you discussed this investigation with Mr. Goland?

ANSWER: Yes.

(1) If so, what was the substance of your conversation(s).

ANSWER: I advised him to retain special counsel when the complaint was first filed and to gather all relevant information.

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(7) Did you ever have business dealings with Mr. Goland?

ANSWER: Yes.

(a) If so, describe in detail the nature of your business dealings and state when they occurred?

ANSWER: See response to 6(b).

(b) How often did you see him for this purpose during such dealings?

ANSWER: I met with him periodically when visiting other clients or speaking at gatherings on the West Coast and in D.C. I cannot recall the precise number of times.

(8) Did you speak to Mr. Goland by telephone during the time Tom Corcoran was a candidate for the U.S. Senate?

ANSWER: Yes.

(a) If so, how often on the average?

ANSWER: Possibly about twice a month.

(b) Did you discuss the Corcoran campaign? If so, what was the substance of the conversation.

ANSWER: No, however, we did speak about Sen. Percy's record on foreign policy issues. We may also have discussed results of various polls relating to Percy's election.

(9) Did you view a presentation by Tom Corcoran made before members of Washington PAC?

ANSWER: Yes.

(a) If so, when did the presentation(s) and viewing(s) occur?

ANSWER: April 6, 1983.

(b) What was the substance of the presentations? Was campaign strategy discussed?

ANSWER: The views of the candidate on foreign policy and defense issues. No specific campaign strategy was discussed other than references which were made by the candidate that he could beat Percy and that he needed funds to do so.

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- (1) For each such presentation state whether you spoke with Tom Corcoran following his presentation?

ANSWER: I probably spoke to him after his presentation to thank him for coming.

- (a) If so, describe the substance of the conversation(s) you had with Mr. Corcoran.

ANSWER: It was probably a very brief thank you because another speaker spoke that day as well.

- (b) Please detail what role you played in arranging and/or coordinating the arrangements to have Tom Corcoran appear before Washington PAC.

ANSWER: As Treasurer, I am in charge of making all arrangements for the regular luncheon meetings.

- (a) Were any written communications exchanged in the process of your arranging the visit of Tom Corcoran to Washington PAC? If so, specify the nature of the communications.

ANSWER: Yes. A confirmation letter is routinely sent.

- (10) Has Tom Corcoran ever discussed or communicated information regarding his campaign, his campaign's strategy, goals and/or purposes with you?

ANSWER: No, other than his statement at the PAC luncheon in which he stated that he believed he could win the race.

- (1) If so, when?

- (2) Describe the substance of each such discussion and communication.

- (11) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory, strategic assistance? If so, did you provide any assistance?

ANSWER: No. Mr. Corcoran never requested my assistance. He did request financial assistance from Washington PAC.

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- (a) If so, describe what kind of assistance you provided as a result of the request.

ANSWER: I transmitted five PAC contributions between January 20, 1983 and January 25, 1984, to the Corcoran campaign. This is the usual contribution pattern for sending Washington PAC contributions tied to specific fundraising events. To the best of my recollection, I also sent Mr. Corcoran by mail, a brief summary of Senator Percy's public positions on the Middle East. The summary was prepared and published by an organization unrelated to Washington PAC and is publicly available on request.

- (12) Have you ever offered Tom Corcoran your assistance, advice or strategy hints relevant to his campaign?

ANSWER: No, other than the PAC financial assistance as outlined above.

- (a) If so, what suggestions or strategies did you discuss with him?
- (b) Have you ever been present when Michael Goland offered advice, suggestions or strategy hints to Tom Corcoran in furtherance of his campaign? If so, when and what advice, suggestions or strategy hints were discussed?

ANSWER: No.

- (13) Have you and Mr. Goland ever discussed the Percy campaign?

ANSWER: Yes.

- (a) If so, when and where did these discussions take place?

ANSWER: We sporadically discussed that campaign as well as others in the course of our legal and business dealings.

- (b) Describe the content and substance of the discussions.

ANSWER: I informed Mr. Goland of the progress of a number of races as discussed in the PAC newsletter, copies of which were attached to my response.

- (14) Did Mr. Goland ever request advice from you concerning the making of expenditures against Senator Percy?

ANSWER: Yes.

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- (a) If so, what was the substance of the advice requested by Mr. Goland?

ANSWER: The advice requested was limited to guidance under the FECA and thus is subject to the attorney client privilege.

- (b) Detail all advice of this type you gave to Mr. Goland, including when you gave such advice.

ANSWER: The advice is subject to the attorney client privilege.

- (15) Did you ever speak with Tom Corcoran at the Washington PAC's offices?

ANSWER: No.

- (a) If so, was it face-to-face or by telephone? Was anyone else present at the time? If so, who?
- (b) Provide the dates and the substance of the discussions you had with Tom Corcoran at the PAC's offices.
- (c) At the time of your discussions, was Tom Corcoran a candidate for the U.S. Senate?
- (d) At the time of your discussions with Tom Corcoran were you advising Michael Goland regarding his expenditures against Senator Percy?
- (e) At the time of your discussions with Tom Corcoran, had you made any contributions to the Corcoran campaign?

- (16) On the occasions when you met with Mr. Corcoran, did you ever indicate to him, in any way, the fact that you were advising Mr. Goland on making expenditures campaign against Senator Percy?

ANSWER: This question assumes incorrectly that I was giving Mr. Goland advice on the campaign. On the contrary, as stated above, I was providing legal advice to Mr. Goland. Therefore, I never had any such conversations with Mr. Corcoran. On one occasion, after I became aware of Mr. Goland's independent expenditures, I received a phone call from a woman whose name I do not recall who identified herself as from Mr. Corcoran's office. I informed her at that time that I would not talk to her--before she indicated the purpose of the call--because a client of mine was making independent expenditures in the Senate race.

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- (a) If so, what was the substance of the discussion or communication regarding this advice?
- (b) When did such discussions or communications with Mr. Corcoran occur?

(17) Did you ever interview Mr. Corcoran?

ANSWER: Yes, on one occasion.

(a) For each such interview state:

- (1) The date and location of the interview.

ANSWER: I do not recall the exact date. I believe it was in March or April 1983. It took place in his office.

- (2) Who was present at the interview?

ANSWER: Mr. Corcoran and some aides whose names I do not recall.

- (3) The purpose of the interview?

ANSWER: As stated in my response to the complaint, the purpose of the interview was to obtain information about Mr. Corcoran's positions for the PAC newsletter and my column.

- (4) What input you had in coordinating and/or arranging the interview. What input Tom Corcoran had in coordinating and/or arranging the interview script.

ANSWER: I requested the interview for the above reasons. There was no "interview script." I asked him questions relevant to the issues addressed in the column and newsletter. Mr. Corcoran had no input.

- (5) The content and substance of each interview.

ANSWER: The interview was on his views on foreign policy.

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- (1) Was the subject of the Corcoran campaign discussed?

ANSWER: The Corcoran campaign was not discussed except that Corcoran stated that he believed he could win because of Republican disaffection with Senator Percy.

- (a) If so, describe what about the Corcoran campaign was discussed during the interview.

ANSWER: See above.

- (18) Are you aware of any fundraising brochures, developed by the Corcoran Committee in which you and Mr. Corcoran are both pictured?

ANSWER: Yes, a friend of mine in Illinois sent me a copy he had received.

- (a) If so, for each such brochure ANSWER the following:

- (1) On what date and by what method did you become aware of the fact that you and Mr. Corcoran were pictured on a fundraising brochure developed by the Corcoran Committee?

ANSWER: I don't recall the date. I believe it may have been July or August 1983.

- (2) Did you voluntarily appear in the picture on the fundraising brochure?

ANSWER: While I was interviewing Mr. Corcoran, he asked if I minded having my picture taken. I have frequently had my picture taken with Members of Congress, so I consented. I had no idea at the time that it was for the purpose of using in a campaign brochure.

- (3) By what procedure were you selected to appear on the fundraising brochure?

ANSWER: I have no idea.

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- (4) Who from the Corcoran campaign was responsible for notifying you regarding the fundraising brochure?

ANSWER: After the interview was published, I was asked if I minded if a portion of it appeared in a brochure. I do not recall the name of the person who asked.

- (5) When and where was the picture used in the brochure taken?

ANSWER: At the time of the interview.

- (6) For what purpose did your picture appear on the brochure?

ANSWER: It was not disclosed to me at the time.

- (7) How many fundraising brochures did the Corcoran Committee send out that contained a picture of you and Mr. Corcoran?

ANSWER: I have no idea.

- (8) Did you assist or have any input into the development of the brochure?

ANSWER: No.

- (19) Did you ever work as an agent, volunteer or in any other capacity on behalf of Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: No.

- (a) If so, when and in what capacity were you working?

- (b) How long did you work in each such capacity?

- (20) Have you ever conducted, arranged, and/or participated in a fundraiser for Tom Corcoran or the Corcoran for Senate Committee?

ANSWER: I did not conduct or arrange any fundraisers for Mr. Corcoran. I do not recall precisely, but I may have attended one event following the making of a PAC contribution.


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Morris Amitay  
MUR 1684  
Response to Interrogatories  
Page 12

(a) For each such fundraiser, state when and where it occurred.

ANSWER: I do not recall the date or place except that, to the best of my recollection, it may have been in the spring of 1983 and that it was held in Washington, D.C.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

  
Morris Amitay 11-5-84

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By

  
David M. Ifshin  
Attorney for Morris Amitay

Date: November 5, 1984

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BEFORE THE FEDERAL ELECTION COMMISSION

MICHAEL GOLAND

MUR 1684

RESPONSE TO INTERROGATORIES

(1) Please state your address, occupation and principal place of business. How long have you been employed in this capacity?

ANSWER: 505 North Lakeshore Drive  
Apartment #4009  
Chicago, Illinois 60611

Self-Employed Businessman  
20221 Prairie Street  
Chatsworth, California 90311

12 years

(2) Please provide the date or approximate date on which you decided to make expenditures against Senator Charles Percy.

ANSWER: Sometime late in 1983.

a) State whether the funds used to make the expenditures were personal funds.

ANSWER: Yes.

b) State whether you received contributions from others in support of your effort.

ANSWER: I did not.

(1) If so, list all parties from whom you received contributions along with the amount received from each.

(3) State whether you were counselled, encouraged and/or advised to make expenditures against Percy.

ANSWER: I was neither so counselled, encouraged and/or advised.

a) If so, state who counselled, encouraged and/or advised you to make expenditures against Percy.

1) Does your anti-Percy campaign represent a self-interest or does your campaign represent the interests of a group of people whom you represent?

ANSWER: Self-interest.

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(a) If the latter, please describe the nature of the group of people whom you represent.

(4) Were you aware that Congressman Tom Corcoran was campaigning for the Senate seat now held by Charles Percy?

ANSWER: I do not recall exactly when I became aware of Mr. Corcoran's decision to run. At no time did that decision have any bearing on my decision to make expenditures against Mr. Percy.

(5) When and how did you first become aware of the fact that Mr. Corcoran was seeking that office?

ANSWER: To the best of my recollection, I read it in the newspaper. I do not recall the date.

(6) Did you contribute any funds in support of the Corcoran campaign?

ANSWER: No.

- (a) If so, when and in what amount(s)?
- (b) At any time during the campaign, did you encourage others to contribute funds to the Corcoran campaign? If so, who and when?

ANSWER: No.

- (c) Were you encouraged to contribute funds to the Corcoran campaign. If so, by whom?

ANSWER: No.

(7) Do you know Tom Corcoran?

ANSWER: I have never met or spoken to Tom Corcoran or anyone on his congressional or campaign staff.

- (a) If so, please state when and how you met Mr. Corcoran.
- (b) Describe your relationship with Mr. Corcoran prior to Mr. Corcoran's campaign for the Senate.

ANSWER: I had never heard of him.

- (1) Did you see him socially?
  - (a) If so, how often on the average?

ANSWER: We object to question (7)(b)(1)(a) to the extent that this question seeks information beyond the scope of the Commission's investigation and

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seeks irrelevant personal information.

(c) Describe your present relationship with Mr. Corcoran since he began his campaign for the Senate seat.

(1) Have you seen him socially?

(a) If so, how often on the average?

ANSWER: We object to question (7)(c)(1) to the extent that this question seeks information beyond the scope of the Commission's investigation and seeks irrelevant personal information.

(d) When and where was the last occasion you spoke with Mr. Corcoran?

(1) State the substance of your conversation.

(2) State whether you have discussed this investigation with Mr. Corcoran.

(a) If so, state the substance of each such conversation, when it occurred and who else was present.

ANSWER: I have never met or spoken with Mr. Corcoran or to anyone on his campaign or congressional staffs.

(8) State whether you have ever had business dealings with Mr. Corcoran.

ANSWER: I have not.

(a) If so, describe in detail the nature of your business dealings and state when they occurred.

(b) How often did you see him for business purposes during such dealings?

(9) Did you speak to Mr. Corcoran by telephone during the time Mr. Corcoran was a candidate for the Senate?

ANSWER: No.

(a) If so, how often - on the average?

(b) What was the subject and purpose of your discussions?

(10) Were you ever a member of Washington PAC?

(a) If so, list the dates of your membership.

(1) State what influence Morris Amitay had on your obtaining membership in Washington PAC.

(2) Have you ever been an officer or board member of the PAC? If so, list the offices and the dates you held them.

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- (b) Describe the circumstances of how you came to know of Washington PAC?

ANSWER: When the Washington Political Action Committee was first formed, I contributed to it at the suggestion of Morris Amitay. Mr. Amitay informed me of the formation of the PAC and requested my participation and financial support. I also agreed to let my name be used as part of the advisory board. I have never attended a meeting of the Washington PAC nor have I ever been a part of any policy discussions, meetings or other processes. I have never participated in any of the decisions or expenditures made by the Washington PAC; my advice has neither been requested nor given. My relationship with the Washington PAC ended in June, 1983.

- (11) Did you ever speak with Tom Corcoran at the PAC's offices? For each conversation state:

ANSWER: No.

- (a) When you spoke with Mr. Corcoran.
- (b) Whether it was face-to-face or by telephone.
- (c) The nature of the discussion.
- (d) Whether Tom Corcoran was then a candidate for the U.S. Senate.
- (e) Whether you had begun to make expenditures against Senator Percy's campaign.
- (f) Whether you had made any contributions to the Corcoran campaign.

- (12) Has Tom Corcoran ever discussed or communicated information regarding his campaign, and/or his campaign's strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

- (13) Has Morris Amitay ever discussed or communicated information regarding Mr. Corcoran's campaign, and/or Mr. Corcoran's campaign strategy, goals and purposes with you?

ANSWER: No.

- (a) If so, when?
- (b) Describe the substance of each such discussion and communication.

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(14) Has Tom Corcoran ever requested your assistance in furtherance of his campaign in any way including, but not limited to financial, advisory and strategic assistance?

ANSWER: No.

(a) If so, describe what assistance you provided his campaign.

(15) Have you ever offered Tom Corcoran your advice and/or strategy hints concerning his campaign?

ANSWER: No.

(a) If so, state when and what suggestions or strategies you discussed with him?

(16) Were you ever present when Mr. Amitay or Mr. Corcoran discussed Mr. Corcoran's campaign.

ANSWER: No.

(a) If so, state when each such discussion occurred, who was present and the substance of the discussion.

(17) When and how did you meet Mr. Morris Amitay?

ANSWER: To the best of my recollection, I first met Mr. Amitay at a cocktail party in March, 1981, in Washington. While it is possible that I may have met him on a prior occasion, I have no specific recollection.

(a) Describe your relationship with Mr. Amitay.

ANSWER: Mr. Amitay is one of my attorneys. My only relationship with Mr. Amitay in regard to my activities in the 1984 Illinois Senatorial Campaign was that he advised me on compliance with the Federal Election Campaign Act and reporting procedures for independent expenditures.

(1) Do you see each other socially?

ANSWER: Same objection as to question (7) (b) (1) (a).

(a) If so, how often on the average?

(2) When and where was the last occasion you saw or spoke with Mr. Amitay?

ANSWER: We speak periodically by telephone. I last spoke

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0  
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5  
1  
1  
6  
5  
8

with Mr. Amitay last week.

- (a) On that occasion, what was the substance of your discussion?

ANSWER: It did not pertain to any matter relevant to the 1984 Illinois Senate race or any other matter relevant to this MUR.

- (3) Have you discussed this investigation with Mr. Amitay?

ANSWER: No, other than a brief conversation after the complaint was filed regarding the necessity for legal representation.

- (a) If so, when and what was the substance of your conversation(s)?

- (18) Did you ever have business dealings with Mr. Amitay?

ANSWER: None outside our retainer agreement.

- (a) If so, describe in detail the nature of your business dealings and state when they occurred?  
(b) How often did you speak to him for business purposes during such dealings?

- (19) Did you speak to Mr. Amitay by telephone during the period in which you made anti-Percy expenditures?

- (a) If so, how often - on the average?  
(b) When was the last time you spoke with Mr. Amitay by telephone?

- (1) What was the subject and purpose of your discussion?

ANSWER: My only discussions with Mr. Amitay by telephone or other means regarding my independent expenditures in the 1984 Senatorial campaign were in the course of legal advice given me by Mr. Amitay on compliance with the Federal Election Campaign Act in regard to my independent expenditures.

- (20) Were you present at any presentation by Tom Corcoran made for members of Washington PAC?

ANSWER: No.

- (a) If so, when did the presentation(s) occur?  
(1) Did you ever speak with Tom Corcoran following his presentation?

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- (a) If so, describe the substance of each such conversation you had with Mr. Corcoran.

(21) Were you present during an interview by Mr. Amitay of Mr. Corcoran?

ANSWER: No.

If not, were you aware that Mr. Corcoran was interviewed by Mr. Amitay?

ANSWER: No.

- (a) If so, list the date(s) of the interview(s).  
(b) What input did you have in the coordinating, arranging, or writing of the interview script(s)?  
(c) What input did you have in the coordinating or arranging of the interview(s)?  
(d) Was campaign strategy discussed during such interview(s)?

(22) Have you ever indicated to Mr. Corcoran your intent to make expenditures against Senator Percy?

ANSWER: No.

If so, for each such discussion state:

- (a) When and where the discussion took place.  
(b) The substance of the discussion.  
(c) Mr. Corcoran's response.

(23) Have you and Mr. Amitay ever discussed the Percy campaign?

- (a) If so, when and where did these discussions take place?  
(b) Describe the content and substance of each such discussion.

ANSWER: Mr. Amitay provided me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures. He also provided me with some information on Percy's voting record.

(24) Did you ever request advice from Mr. Amitay as to how to organize or coordinate your expenditure campaign against Senator Percy?

ANSWER: As noted previously, the only significant involvement of Mr. Amitay in this matter was to provide me with legal advice on compliance with the Federal Election Campaign Act after I had decided to make independent expenditures.

85040511660

(a) If so, list the dates of such requests.

(25) Did Mr. Amitay ever advise you as to how to organize or coordinate your expenditure campaign against Sen. Percy?

ANSWER: No.

(a) If so, for each occasion on which such advice was given state:

- (1) the date the advice was given.
- (2) the substance of the advice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. 28 U.S.C. Section 1746.

\_\_\_\_\_  
Michael Goland

Respectfully submitted as to objections,

MANATT, PHELPS, ROTHENBERG & TUNNEY  
DAVID M. IFSHIN

By \_\_\_\_\_

David M. Ifshin  
Attorney for Michael Goland

Date: \_\_\_\_\_

85040511661

GCC#4156  
Nur 1684

July 17, 1984

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

JUL 25 P 2:29

Dear Mr. Steele:

I hereby authorize any Special Agent or other authorized representative of the Federal Bureau of Investigation (FBI) bearing this release, or copy thereof, within one year of its date, to obtain any information in the files of the Federal Election Commission pertaining to the Corcoran for Senate Committee, P.O. Box 2667, Aurora, Illinois, of which I am Treasurer. I hereby direct you to release such information upon request of the bearer. This release is executed with full knowledge and understanding that the information is for the official use of the Federal Bureau of Investigation and that this release constitutes a waiver of confidentiality. Consent is granted for the FBI to furnish such information, as is described above, to third parties in the course of fulfilling its official responsibilities. I hereby release you, as custodian of such records, from any and all liability for damages of whatever kind, which may at any time result to me, my heirs, family, or associates because of compliance with this authorization and request to release information, or any attempt to comply with it. Should there be any questions as to the validity of this release, you may contact me as indicated below:

FULL NAME

William F. Keck  
Signature

FULL NAME:

WILLIAM F. KECK  
TYPE OR PRINT NAME

DATE:

JULY 17, 1984

CURRENT ADDRESS:

61 Maple Street

Sugar Grove, Illinois

TELEPHONE NUMBER:

(312) 466-4660

85040511662

ATTACHMENT I

LAW OFFICES OF  
DAVIS AND GOOCH

920 PENNSYLVANIA AVENUE, S. E.

WASHINGTON, D. C. 20003 26

(202) 543-3600

DANIEL J. SWILLINGER  
OF COUNSEL

WILLIAM B. DAVIS •  
RAYMOND L. GOOCH •

• ALSO MEMBER NORTH CAROLINA BAR  
• ALSO MEMBER VIRGINIA BAR

April 25, 1984

MUR 1684

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

Dear Mr. Steele:

This Complaint is being filed on behalf of Senator Charles H. Percy and Citizens for Percy '84, his principal campaign committee for the 1984 primary and general elections.

The following statements and representations are made upon information and belief.

INTRODUCTION

A Los Angeles businessman, Mr. Michael Goland, financed a substantial radio, television and direct mail campaign against Sen. Percy prior to the March 20, 1984 Illinois Republican Senatorial primary. Mr. Goland has reported these expenditures to the Commission as independent expenditures, which, under the Act and regulations, are not subject to contribution limitations. By reporting these expenditures as independent, he is stating that they were not made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of the candidate." 11 CFR §109.1(a).

In fact, as the following discussion and accompanying documentation demonstrates, these expenditures were made in coordination and consultation with the campaign of Rep. Thomas Corcoran, Sen. Percy's principal primary opponent.

This constitutes a major violation of the Act. Since the expenditures are not independent, they are contributions well in excess of the \$1000 per election limitation. The Act provides that in the case of a violation of the contribution limitations, the Commission may impose a fine equal to the illegal contribution; in this case, that means at least \$278,729.

3  
6  
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1  
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8

THE VIOLATIONS

As reported in the enclosed story from the March 8, 1984 Chicago Tribune (EXHIBIT 1), Mr. Goland is a California real estate investor. The Tribune article states that he has purchased over \$100,000 worth of radio and television time in Illinois attacking Sen. Percy. Mr. Goland's FEC filing puts the amount at \$152,090. (EXHIBITS 4 & 4a) Attached are transcripts of the advertisements he ran. In a radio ad Mr. Goland urges voters "to make a change in Illinois" and send a different person to the Senate (EXHIBIT 2); in a television spot (EXHIBIT 3) he states that the U.S. Senate is no place for someone with a voting record like Sen. Percy's.

In addition, Mr. Goland has funded a \$127,000 anti-Percy direct mail campaign. (See Sec. B).

All of these expenditures clearly advocate Sen. Percy's defeat.

A. The Amitay Connection

In Part 109 of the Commission's regulations, an "independent expenditure" is defined as an expenditure designed to influence an election which is not made:

with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or any authorized committee of the candidate.

11 CFR §109.1(a).

The Commission's regulations go on to state that the Commission will presume that an expenditure is not independent when it is made through a person authorized to raise funds for a candidate, 11 CFR §109.1(b)(4)(i)(B), or by someone who was told of the campaign's "plans, projects or needs." 11 CFR §109.1(b)(4)(i)(B).

Mr. Goland made these expenditures at the direction of Mr. Morris Amitay, an individual who was both an agent of and fundraiser for the Corcoran campaign. Mr. Amitay was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs. Consequently, further investigation will most likely show that Mr. Goland's expenditures were made with the knowledge of these plans and needs. These are two bases upon which the Commission can find that Mr. Goland's expenditures were not independent.

Mr. Amitay's relationship to the Corcoran campaign is amply documented. One of the very first fundraising letters sent out by the Corcoran campaign (EXHIBIT 5), contained an interview of Rep. Corcoran by Mr. Amitay. Furthermore, the February 13, 1984 issue of the Baron Report (EXHIBIT 6), a highly respected newsletter on politics, states that Mr. Amitay "is raising funds for and advising Corcoran." This is confirmed by a story in the March 3, 1984 Wall Street Journal (EXHIBIT 7). Clearly, Mr. Amitay is intimately connected with the Corcoran campaign.

(He has indicated that he intends to support Rep. Paul Simon in the general election, his sole objective being to defeat Sen. Percy.)

The relationship between Mr. Goland and Mr. Amitay is also well documented. Mr. Goland is a Board member of the Washington Political Action Committee; Mr. Amitay is the Committee's Treasurer. The two have thus had frequent opportunities to converse about the primary campaign. FEC reports show that Washington PAC has contributed to the Corcoran campaign on two occasions, once in 1983 and again this year.

However, it is not necessary to infer coordination or control between Mr. Amitay and Mr. Goland from the fact that they have had an opportunity to discuss the Percy/Corcoran race. Mr. Amitay has himself said that he controls Mr. Goland's political expenditures. In a February 24, 1984 letter to a Washington political fundraiser, Mr. Amitay stated that Mr. Goland did not "make a move without my o.k." (EXHIBIT 8). This is a clear admission that Mr. Goland's expenditures were at Mr. Amitay's direction. It conclusively shows that the expenditures by Mr. Goland have not been made independently of the Corcoran campaign.

#### B. The AB Data Connection

Mr. Goland also financed an anti-Percy letter (EXHIBIT 9) on behalf of Rep. Corcoran. This 90,000 person mailing was produced by AB Data, Ltd. of Milwaukee at a cost of \$27,639.60, according to Mr. Goland's FEC filing (EXHIBIT 10). He paid an additional \$100,000 for anti-Percy direct mail to an Arlington, Virginia firm (EXHIBIT 10a), which we believe to be part of the same coordinated effort.

AB Data is also the direct mail fundraising firm used by Rep. Corcoran, as evidenced by his FEC reports (EXHIBIT 11), which show the campaign paid AB Data nearly \$220,000 in 1983 and 1984, and still owes \$40,000 to AB Data. Jerry Benjamin, a direct mail consultant, is a principal of AB Data, and was a consultant to the Corcoran campaign. (EXHIBIT 12).

Charles N. Steele, Esquire  
April 25, 1984  
Page Four

Clearly, Mr. Goland was coordinating his direct mail efforts with those of Rep. Corcoran. It was no coincidence that, out of the hundreds of direct mail fundraising firms in the country, Mr. Goland picked the very same one which was servicing Rep. Corcoran.

Commission regulations, 11 CFR § 109.1(b)(4) and (5), and past enforcement matters (i.e. MUR 1424, Caputo, Finkelstein, NCPAC) hold that when a campaign and a person making expenditures on behalf of that campaign use the same fundraising agent, the expenditures are presumptively not independent. Mr. Goland's mailing was designed to assist the Corcoran campaign. Its content and timing were designed by Rep. Corcoran's direct mail consultant to provide the maximum benefit to the Corcoran campaign.

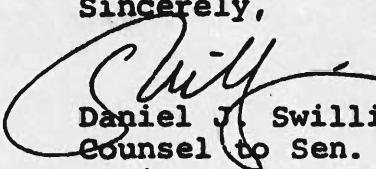
#### CONCLUSION

Expenditures which do not qualify as independent are treated as contributions to the candidate who benefitted from the expenditures. In Mr. Goland's case, this means he contributed more than 278 times the \$1000 legal limit to the Corcoran campaign. (According to FEC records, this is nearly 13 times more than anyone spent supporting or opposing Congressional candidates in 1982.)

The information provided herein is strong and direct evidence that Mr. Goland's expenditures were not permissible, and provides the Commission with an abundance of data more than sufficient to require the Commission to undertake an investigation of Mr. Goland's illegal contributions, and his intimate relationship with the Corcoran campaign and its agents.

Thank you for your prompt attention.

Sincerely,

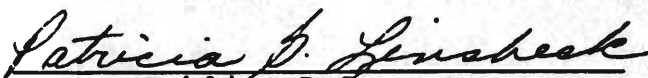
  
Daniel J. Swillinger  
Counsel to Sen. Percy and  
Citizens for Percy '84

Attachment - EXHIBITS

Washington  
District of Columbia: SS

SUBSCRIBED and SWORN TO before me this 25<sup>th</sup> day of April, 1984.

My Commission Expires January 1, 1987

  
Notary Public, D.C.

EXHIBITS

1. Chicago Tribune, March 9, 1984
2. Radio ad transcript
3. TV ad transcript
4. Goland telegrams reporting radio and TV expenditures
5. "CAN YOU NAME..." Corcoran fundraising letter
6. Baron Report, February 13, 1984 pp 3 and 4
7. Wall St. Journal, March 8, 1984
8. Amitay letter, February 24, 1984
9. Anti-Percy mailing, paid for by Goland
10. Goland telegrams reporting direct mail expenditures and Knabe letter.
11. Corcoran report
12. Daily Herald, July 7, 1983

85040511667

# Californian assails Percy in TV ads

By David Axelrod  
and Howard Wilt

A WEALTHY California real estate investor prominent in Los Angeles Jewish circles has purchased more than \$100,000 worth of Illinois radio and television time for ads that attack Sen. Charles Percy (R., Ill.) as a "two-faced senator" who should be unseated.

The ads are to begin running Friday on WGN-TV (Channel 9), WGN-AM and at least eight Downstate radio and television stations, said a spokesman for the Chicago firm hired to produce them. The three network-owned stations in Chicago have declined to run the ads, the spokesman said.

The 60-second radio spot and 30-second TV ad feature the voices of a man and a woman alternately criticizing Percy for changing his position "every time the wind blows."

Michael Goland, the Californian who purchased the ads, said through a spokesman Thursday that he is not running the ads on behalf of any particular candidate. The radio ad, played for a reporter Thursday, closes with the statement: "Not authorized by any candidate or candidate's committee."

BUT KATHY LYDON, a Percy spokesman, charged that attorneys for the Percy campaign "have been given information that raises questions about the possible connection between this independent expenditure and our primary opponent."

Don Philmore, a spokesman for U.S. Rep. Thomas Concoran, Percy's major opponent in the March 20 Republican primary, replied, "We have nothing to do with those ads."

Goland, who says he has business interests in Chicago as well as California, declined to be interviewed about his reasons for buying the ads, said Margaret Navaho, a vice president of the Kelly, Scott & Madison advertising firm in Chicago, which was hired by Goland to produce the spots.

He did, however, release several comments through Navaho. "I have not made up my mind as to whom to support yet in the general election," Goland said in the



Ads criticize Sen Charles Percy for changing his position "every time the wind blows."

statement. "But I do know that I am opposed to Sen. Percy's re-election because of his lack of consistent, effective representation in the Senate on a large number of issues."

NAVOLIO SAID Goland resented being asked whether his religious affiliation had motivated him. Percy, chairman of the Senate Foreign Relations Committee, is viewed by some U.S. Jewish leaders as being insufficiently sympathetic to Israel.

The ads make no mention of Percy's Mideast stands. They charge that he announced he was for an all-volunteer Army but voted for draft registration; claimed to be against the dumping of nuclear wastes but voted to deny states the right to veto sites; and vowed to oppose cuts in education funding but voted to reduce school nutrition programs and training for the handicapped.

Lydon denied each charge. Percy never voted for draft registration, she said; it was imposed by President Jimmy Carter. Percy has supported a combined state and federal approach to nuclear waste disposal, she said, and he has consistently voted for increased education budgets.

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Michael Goland :60 Radio Commercial -- "Two-Faced"

ANNCR: What would you say about someone who says one thing and does another? What would you think about a man who changed his position every time the wind blows? What do you call a politician who promises to stand up for you and then takes the other side?

In Illinois we call him Senator Percy. When he went to the Senate he said he was for an all-volunteer Army. But Percy voted for compulsory draft registration. Charles Percy said he was for states rights and against the dumping of nuclear waste. But he voted to deny states their right to veto nuclear dump sites within their borders.

Percy said he would never allow cuts in the funding of our children's education. But Percy voted against maintaining school funding, against education and training for the handicapped, and against school nutrition programs.

In this election year with so much at stake let's make a change in Illinois and send one face to the Senate, not two. The two-faced Senator is a real disadvantage.

Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

85040511669



EXHIBIT 3

Kelly, Scott and Madison, Inc.  
One East Wacker Drive, Suite 3320  
Chicago, Illinois 60601  
312 828-8850

TITLE: "COLORS" (POLITICAL ADVOCACY)  
COPY: 30 SECOND TELEVISION  
CLIENT: MICHAEL GOLAND; INDEPENDENT EXPENDITURE

COLORS

OPEN ON: GREY LIMBO SETTING (TABLE TOP WITH SWEEP)  
FROM LEFT CORNER, SMALL CHAMELEON CRAWLS TO CENTER STAGE

V.O.

IN ALL THE YEARS CHARLES PERCY  
HAS BEEN IN THE SENATE, IT'S BEEN  
HARD TO KNOW HIS TRUE COLORS

BY THE END OF THE ABOVE, THE CHAMELEON IS CENTER STAGE AS CAMERA TRUCKS  
IN, THE CHAMELEON BEGINS TO TURN A SHADE OF RED

V.O.

WHEN WE SENT PERCY TO THE U.S. SENATE  
HE SAID HE WAS FOR AN ALL-VOLUNTEER ARMY

CHAMELEON TURNS TO A SHADE OF YELLOW

V.O.

BUT IN 1980 PERCY VOTED FOR  
-COMPULSORY REGISTRATION FOR  
THE DRAFT

CHAMELEON TURNS TO GREEN AS CAMERA PANS THE LENGTH OF ITS BODY

V.O.

PERCY SAID HE WAS AGAINST THE DUMPING  
OF NUCLEAR WASTE AND FOR THE RIGHT OF  
STATES TO CONTROL IT

PAN ACROSS OTHER SIDE OF CHAMELEON AS IT TURNS TO BLUE

85040511670

V.O.  
THEN HE VOTED TO DENY STATES  
THE RIGHT TO HAVE NUCLEAR DUMP  
SITES WITHIN THEIR OWN BORDERS

CAMERA TRUCKS IN ON CHAMELEON'S HEAD AND EYES AS IT TURNS ORANGE

V.O.

IN MARCH OF 83 PERCY SAID HE WAS  
OPPOSED TO CUTBACKS IN FUNDING FOR  
EDUCATION

CHAMELEON TURNS PURPLE AS TABLE IS ROTATED SO THAT CHAMELEON APPEARS TO  
TURN.

V.O.

BUT PERCY VOTED AGAINST MAINTAINING  
FUNDING FOR OUR SCHOOLS, AGAINST  
EDUCATION FOR THE HANDICAPPED AND  
TO DENY MONEY FOR NEEDED SCHOOL  
LUNCH PROGRAMS

CAMERA PULLS BACK AS LIZARD IS SEEN FROM A STRAIGHT-ON POSITION

V.O.

PERCY SAID HE WOULD NEVER VOTE  
FOR A RED INK BUDGET

CHAMELEON CHANGES COLOR AGAIN

V.O.

THEN VOTED FOR THE LARGEST DEFICIT  
IN HISTORY...AND FOR A RAISE IN  
HIS SENATE PAY

PULL BACK SLOWLY AS CHAMELEON CHANGES COLOR MORE RAPIDLY

V.O.

IN TWENTY YEARS WE HAVEN'T LEARNED  
PERCY'S TRUE COLORS. BUT WE HAVE  
LEARNED THAT THE U.S. SENATE IS NO  
PLACE FOR A CHAMELEON

85040511671

0157P EST 13:57 EST

EXHIBIT 4

Western Union

Telegram

1992 MAR 16 PM 4:52

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTHEAST  
WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY. TO ACHIEVE THIS I  
PAID \$16,700 TO KELLY, SCOTT, AND MADISON, 1 EAST WACKER DRIVE,  
CHICAGO, ILLINOIS 60601.

CC: ILLINOIS STATE BOARD OF ELECTION  
MICHAEL GOLAND  
20221 PRAIRE ST  
CHATSWORTH CA 91311

13:57 EST

1PMPOMX WSH

850840516725916

0757P EST 14157

EXHIBIT 4a



Telegram

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTH EAST  
WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY. TO ACHIEVE THIS I  
PAID \$135,390.00 TO KELLY, SCOTT, AND MADISON 1 EAST WACKER DRIVE  
CHICAGO ILLINOIS 60601  
MICHAEL GOLAND  
20221 PRARIE ST  
CHATSWORTH CA 91311

14157 EST  
IPMPOMX WSH

8508460398933333

RECEIVED  
FBI  
JAN 15 1968

CAN YOU NAME  
ISRAEL'S  
FIRST ADVERSARY  
IN CONGRESS?



*@ Pay*

85040511674

FIRST CLASS POSTAGE WILL HELP



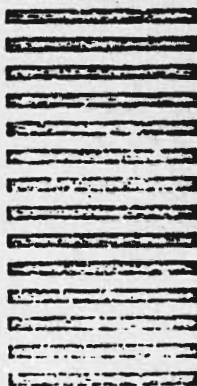
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**BUSINESS REPLY MAIL**  
FIRST CLASS PERMIT NO. 40 AURORA, IL

POSTAGE WILL BE PAID BY ADDRESSEE

attn: Lou Morgan

Corcoran Committee  
P.O. Box 2667  
Aurora, IL 60507



# We can defeat Charles Percy!

CA38  
MR. ARTHUR RUBLOFF  
1040 N. LAKE SHORE DR.  
CHICAGO, IL 60611

AZZ

Enclosed is my check for:  
☐ \$1000 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50  
☐ \$25 ☐ Other \$ \_\_\_\_\_

Please make checks payable to: The Corcoran Committee  
P. O. Box 2667  
Aurora, IL 60007

To help us comply with F.E.C. filing requirements,  
please provide all the following information:

☐ Mr. ☐ Mrs. ☐ Ms. ☐ Mr. & Mrs. ☐ \_\_\_\_\_

NAME Last First

HOME TELEPHONE

OCCUPATION TITLE

FIRM/ORGANIZATION ☐ SELF-EMPLOYED

Please correct my address to:

Although we try to eliminate duplication, it is not always possible to prevent your receiving more than one letter. If you receive an extra copy, please pass it along.

## Morrie Amitay talks with Tom Corcoran

AMITAY:

Tom, U.S.-Israel relations has become a pivotal issue in the Illinois Republican Primary. Why is that?

CORCORAN:

U.S.-Israel relations is presently a hot topic of conversation all over the country, including Illinois. Because Percy has such a negative voting record on this issue and mine is just about the opposite, the public has naturally picked up on it. It defines a clear difference in our political philosophies.

AMITAY:

I know you have only a small number of Jewish voters in your district and that you are not Jewish. Why, then, are you a supporter of Israel?

CORCORAN:

Symbolically, I believe in Israel for many of the same reasons I believe in America. The people of Israel, by the depth of their hard work and high intelligence, created a modern, stable and democratic society from virtually nothing — much like the authors of our Constitution. When I first visited Israel, I knew immediately that I was in a free and vibrant country.

AMITAY:

Can you be a little more concrete?

CORCORAN:

Sure. Israel is an ally. She is an invaluable friend of the United States. And, I am convinced that the national security of our country requires a strong and secure Israel. If we had a few more allies of Israel's quality, we — and the world — would be a lot better off.

AMITAY:

I take it your stance on Israel is not your main reason for entering the primary. Is it?

CORCORAN:

No. Simply, I will run against Percy because I believe I can do a more credible job of representing all the citizens of Illinois.



Tom Corcoran (left) discusses U.S.-Israel relations with Morrie Amitay (right).

IMPORTANT  
FINANCIAL  
INFORMATION  
ON BACK

Mr. Amitay is the former Executive Director of the American Israel Public Affairs Committee (AIPAC). Presently, he is a practicing attorney in Washington, DC, and a nationally syndicated columnist.

# **IMPORTANT** **FEDERAL** **ELECTION** **REQUIREMENTS**

Individuals may contribute up to \$1,000 to the primary and \$1,000 to the general election. A husband and wife may each contribute up to the \$1,000 limit for each election. Each child under 18 may voluntarily decide to contribute up to \$1,000 towards each election from their own funds.

Partnerships may make contributions up to the aggregate individual limits of each partner. All partnership checks must either clearly indicate the partners to whom the contribution is to be credited and the amounts to be credited to each, or must be accompanied by a partnership breakdown by percentages and the contribution will be allocated in accordance with these percentages.

Corporations, Proprietorships and Unions cannot contribute to the committee except through corporate or union PACS.

Corporate, Union or Other Political Action Committees (PACS) filed with the Federal Election Commission may make contributions of up to \$5,000 to the primary and \$5,000 to the general election.

Your contribution is eligible for a federal income tax credit in the amount of one-half of the contribution. The maximum credit that can be claimed in one year is \$50 per individual or \$100 for married couples filing joint returns.

Your help in providing the names and addresses of friends and associates who would be interested in contributing would be greatly appreciated. Please enclose a list of these individuals with your reply card.

Paid for by The Corcoran for Senate Committee,  
Donald M. Cassidy, Jr., Treasurer

## **6 Tom Corcoran**

### **6 Highlights from the record of a good friend**

- Wrote a letter to President Reagan, urging him to lift the suspension of delivery of the F-16 aircraft to Israel (6/81).
- Voted to disapprove the sale of AWACS and offensive enhancement equipment for the F-15's to Saudi Arabia (10/81).
- Co-sponsored a concurrent resolution calling upon the Union of Soviet Socialist Republics to end the current policies of Jewish emigration discrimination and anti-Semitism (11/81).
- Voted for \$2.2 billion in military and economic assistance for Israel (12/81).
- Wrote a letter to General Jarulzelski, expressing concern over recent reports of officially sanctioned anti-Semitic statements made in the Polish media (2/82).
- Co-sponsored a concurrent resolution commending the State of Israel for its compliance with the Camp David accords (7/82).
- Wrote a letter to President Reagan, expressing opposition to the sale of advanced military weapons to Jordan unless King Hussein agrees to join the peace process. (Corcoran was the original signatory and key Republican spearheading the letter. It was sent with 182 signatures. 12/82)
- Wrote a letter to President Reagan, urging an end to the delay of the sale of F-16 aircraft to Israel (3/83).
- Recently brought out two "refuseniks" from the Soviet Union and continues to work tenaciously for the cause of Soviet Jewry.

"Tom Corcoran believes in America  
 and her commitment to Israel."

In most Senate races this year, both parties' nominations are uncontested. In most of the exceptions, primary battles will be waged for the privilege of losing, or will not involve factors of national significance.

But a few primaries will be significant in measuring the impact of particular issues, ideological factions, constituencies, party organizations and campaign strategies and tactics. The first of these is in Illinois.

Republicans Since his close call last time, there's been no question that Sen. Charles Percy would face a primary challenge from the right. Percy worked to appease the opposition. Between 1977 and 1982, his ACA (conservative) Senate voting record rating skyrocketed from 10 to 56% and his Chamber of Commerce rating moved from 53 to 65%. Percy's ADA (liberal) rating fell from 65 to 45% and his rating from the AFL-CIO (which endorsed him last time), from 47 to 28%. Percy won the support of President Reagan, plus the vast majority of his state's GOP party and public officials. He has campaigned vigorously for months, and raised record funds. An early February statewide poll for WLS-TV puts him ahead of his New Right primary challenger, Rep. Tom Corcoran, 65-17%. Only 46% of the respondents could identify Corcoran and only 16% had an opinion of him.

Percy appears less vulnerable than other recent rightwing primary targets for two other reasons. First, the Illinois Republican party is much more non-ideological and moderate than many others. Second, charges that Percy is disloyal to Reagan could backfire: traditionally in American politics, even a President's partisans do not want their Senators to be "rubber stamps."

Nevertheless, Percy is not safe. He remains an anathema to rightwing activists, who are infuriated by liberal moves (such as meetings with Jesse Jackson); assert his changing voting record is a fraud and reflects lack of character; find him personally "pompous" and stereotypical of establishment elitists. One cannot underestimate the impact of such activists in a low turnout; nor should one overestimate how much the GOP organization can deliver for Percy. Most of its leaders back him because he's the incumbent and is more electable in November, rather than out of conviction.

Corcoran is bright and aggressive; he's been campaigning for over a year. Polls this early are highly unreliable in primaries, since few voters have focused on the race, so an upset remains possible.

One other factor: leaders of the pro-Israeli lobby view Percy as an arch-enemy. Morrie Amitay, a former aide to liberal Sen. Ribicoff (D-CT) and ex-director of the American Israel Public Affairs Committee, is raising funds for and advising Corcoran. Response has been less than hoped for; indeed, there's been somewhat of a pro-Percy "backlash" among moderate Jews offended by the nature of the anti-Percy appeals as well as Corcoran's ideology. (Amitay contends he'll switch to Rep. Paul Simon, the Democratic frontrunner, in November, even if Corcoran upsets Percy.)

Democrats Rep. Paul Simon, the strong frontrunner, hesitated before entering the race. As a newspaper publisher, state legislator and Lt. Governor from southern Illinois, Simon built a record as a progressive, "good government," reformer. He ran for the 1972 Gubernatorial nomination, with the endorsement of the party organization, including Chicago's Mayor Daley. But ironically, Simon was labeled the machine candidate and lost to maverick Dan Walker. In 1974 he was elected to the House, where he has become a leader on education and labor issues. Despite a narrow race in 1980 (after backing Kennedy against Carter in his conservative district and facing a GOP opponent named John Anderson), Simon's House seat is secure. But national Democratic, liberal, labor and Jewish leaders convinced him to take on Percy.

State party leaders found Simon fully acceptable, but top ones would not

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reject a bid for support from Phil Rock, the aggressive State Senate President and party leader. Rock's power has helped him recruit not only organization Democrats, but Hispanics, unions (like AFSCME) and others he's helped in Springfield. (The AFL-CIO split 47 Simon, 12 Rock, 1 Burris and 39 for no endorsement, which prevailed, since a 2/3 vote was needed for one.) Rock is backed by the white faction of the Chicago party, led by Alderman Eddie Vrdolvak. (But most downstate county chairs back Simon.)

Chicago Mayor Harold Washington is not active in the race. Indications are that he personally prefers Simon. But, he expresses loyalty to the organization. And the third candidate, black State Controller Roland Burris, makes it impossible for him to move in any direction. For Washington, that may be complicated, but it's certainly convenient. Mathematically, Burris, a banker and moderate, could conceivably win a plurality in the four way race, if blacks bloc vote. But there's little likelihood of that: Burris is having money problems, poll results are discouraging, and he may even drop out.

The fourth contender is Alex Seith, a Chicago Ivy League attorney who served as the Daley machine's spokesman in Party reform battles. Seith scared Percy in 1978, but lost the 1980 primary to Sen. Dixon, drawing 19% of the vote. Seith's already spent some \$500,000 of family money (primarily) on Chicago TV. And it's had an impact, as the following polls indicate.

The February WLS-TV survey reported Simon 31%, Seith 20%, Burris 9%, Rock 9%. A late January poll by WBBM-TV reported Simon 34%, Seith 14%, Burris 12%, Rock 9%. (In Chicago, the figures were, respectively, 26%, 15%, 14%, 13%.)

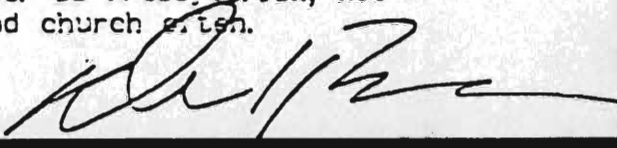
#### GETTING GOD INTO POLITICS

President Reagan is seeking to make prayer in public schools a major campaign issue, after ignoring it since the last campaign. "Voluntary" prayer is favored by about 75% in polls; that's a strong consensus, even though it's less than the level of support for sex education. (Parents are pragmatic.) And Democrats are, for the most part, terrified of taking Reagan on on it.

If they did, they might be surprised at the public's good judgement. In the polls, the main reason given for favoring school prayer is that people have the right to pray anywhere they want. What RR proposes is not "voluntary," but "non-compulsory" prayer. When such prayer was allowed, the few school children with the courage to opt out were generally told to wait in the hall or the principal's office. Finally, the only two possible sources for classroom prayers - those of particular religious groups and those drafted by government agencies - each would meet with strong opposition.

That's why rightwing Sen. Orrin Hatch (R-UT), among others, advocates legislation allowing a "moment of silence" in classes. That concept has drawn support from such respected liberals as Rep. Earney Frank (D-MA), provided, obviously, there's no instruction to silently pray. But Reagan's rejected that alternative, as it would cost him his "they've taken God out of the schools" rhetoric. One question he does not address: if he believes the Supreme Court has the ability to remove God from the schools, does he also believe the Supreme Soviet has succeeded in removing God from Russia?

Human Events, the "house organ" of New Right Republicans, has opened the 1984 political/religious campaign on other fronts. Its most recent issue includes attacks on the National Council of Churches and Islamic leaders, and Reagan's address to the Religious Broadcasters, which, he concluded with Christian prayers. The issue also exposed Walter Mondale's brother, a retired Minister nearing eighty. Lester Mondale, it seems, is a "Humanist" and "Humanists" favor sex education and the nuclear freeze. The article admits that Walter is Presbyterian, not "Humanist", but it reports that he does not attend church often.



## Humbling Fight Despite His Prestige, Sen. Percy Runs Scared In the Illinois Primary

Foreign Affairs Panel Chief  
Is the Only GOP Senator  
Facing Such a Challenge

### Ill Luck of Two Predecessors

By DEBORAH FARMER

Staff Reporter of THE WALL STREET JOURNAL  
DECATUR, ILL.—"I just love these town hall meetings!"

Speeding across the mountain Illinois prairie, Sen. Charles Percy, the constant boy wonder of Illinois Republican politics, was putting a convincing face on a dubious argument. Half a world away, in Moscow, dignitaries from many nations were assembling to bury Yuri Andropov. But to hear the chairman of the Senate Foreign Relations Committee tell it, the pagentry of Red Square didn't hold a candle to the El-fingham East Western, which he had just left, or the Decatur Holiday Inn, to which he was heading.

"Not for me. I wouldn't want to be there," Sen. Percy confided in his rich senatorial baritone. "With my schedule this week—you've seen my schedule—can you see me canceling out to be in Moscow? I would have been miserable over there."

Maybe. Trouble is, Sen. Percy, who didn't press hard to go to Moscow, can hardly be ecstatic over here. For the senator, who has long been dogged by a reputation for pomposity and by grumbling that he is more at home on the streets of Paris, France, than Paris, Ill., is running scared. Again.

The senator survived a harrowing 1978 Democratic challenge, mostly because of his opponent's mistakes and his own show of humility. "I've got the message," he assured voters then. Now, he is being tested within his own party, in the March 20 Illinois primary. He is the only GOP senator to face a primary challenge. Most Illinois Republican officials predict that he will survive: a recent Chicago Sun-Times/Channel 5 News poll showed him leading by 71% to 29%. But even if he does survive, Sen. Percy will go into a difficult fall campaign in weakened political condition. Four Democrats are vying to take him on.

So, once again, Illinois voters are witnessing the spectacle of a man who has always eyed the distant horizons—only to keep bumping into the here-and-now. It is an object lesson in how the uncertainties of political life can humble the proudest ego, thwart the grandest dream.



Chuck Percy is the stereotypical man in a hurry. At age 58, he was named to head Bell & Howell—the youngest chief executive of a major corporation in the nation. Elected to the Senate at 47, he was immediately portrayed as presidential material, the hope of the "Rockefeller wing" of the GOP. He did little to discourage such portents. And in the midst of Washington, which provided an upheaval in Republican presidential politics, he began actively exploring a 1976 presidential run.

But that idea died after Gerald Ford took hold of the White House. In retrospect, that time marked the high tide of the Percy career. Today, at 64, the blond hair has gone to gray, the GOP's "Rockefeller wing" has crumbled, and Charles Percy must run very hard just to stay where he is.

"Chuck Percy will be defeated in 1984," asserts his only serious primary opponent, Tom Corcoran, a conservative four-term congressman who likes to joke that, if elected, he would be the first senator from Notre Dame. "It's just a question of whether he is defeated in the primary or the general," Rep. Corcoran says, adding:

"In the past, he has always taken Republicans for granted, then reached out for labor, blacks and Jewish voters. But this year, labor wants a Democratic Senate, blacks are going to vote a straight Democratic ticket and Jewish voters are upset over his attitude toward Israel. Chuck's coalition has fallen apart. Time has caught up with him."

Rep. Corcoran, who talks of spending up to \$1.4 million in his primary-election effort,



POLITICS

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Hart draws spotlight in Georgia's Democratic primary. (Page 62)

has assembled an odd coalition of his own: hard-line conservatives of the New Right, liberal-leaning Jewish contributors and a scattering of grass-roots GOP workers. The New Right activists helped persuade him to run and lent him campaign start-up money. Some Jewish contributors, out to punish Sen. Percy, are pumping contributions into the Corcoran campaign. But if he does pull it off, the disgruntled grass-roots workers will probably be the surprise factor.

"A lot of precinct captains have had it with Percy," says Don Totten, an important Corcoran backer who headed Ronald Reagan's 1980 Illinois campaign. "The key is whether they reach out and bring orders."

Please Turn to Page 22, Column 1

# Humbling Fight: Despite His Prestige, Sen. Percy Is the Only GOP Senator to Face Primary Challenge

Continued From First Page

voters to Corcoran. It's an uphill fight. But if they do reach out, and if the turnout is low, then Corcoran could surprise." The Corcoran hope is that the independent voters who might normally back Sen. Percy will be attracted to the more interesting Democratic presidential primary this time, leaving the field to more conservative Republican voters.

Sen. Percy, though, is leaving little to chance. He will spend \$1.5 million or so in the primary campaign. Former President Ford campaigned for him. Sen. Percy has launched an expensive series of television ads, something he once said would be unnecessary in the primary. He is busily setting up a telephone-bank operation. And he is working tirelessly.

"I had a report this morning from Quincy," Gov. James Thompson quipped in introducing the senator recently. "A man stopped to tie his shoelaces; Chuck Percy talked to him for 20 minutes. Last week in Chicago, two elderly ladies passed while crossing the street, and Chuck Percy was there, talking about the deficit."

## Major Supporters

From "Big Jim" Thompson and House Republican Leader Robert Michel on down, a phalanx of Illinois Republican heavyweights supports the embattled senator. Under the governor's watchful eye, the Big Lincoln Day lunch at Springfield last month turned into an unofficial Percy rally. Huge buttons distributed at the door juxtaposed pictures of the senator and Abraham Lincoln, the governor introduced the senator as "an Illinois treasure," and the official program featured 19 Percy photographs.

Still, there is an air of faded glory about the Percy campaign, and about the senator himself, an air of a man who has gone as high as he is going to go. "Time and opportunity have passed him by," Mr. Totten says. "If he wins reelection, I think this will be his last term."

What he has attained—the prestigious Foreign Relations Committee chairmanship—is a lot. But recent political history hasn't been kind to the committee's chairmen. Predecessors J. William Fulbright and Frank Church both lost reelection bids. Something about the job, with its glamorous trips to foreign capitals and its preoccupation with the rarefied issues of statecraft, doesn't sit well with ordinary voters. And it is one of the ironies of Sen. Percy's life that his performance as chairman has given Tom Corcoran issues to exploit.

## Earlier Moscow Trip

"Remember when Senator Percy went to Moscow and embarrassed Ronald Reagan?" asked one early Corcoran television spot. This refers to a Percy trip, at the dawn of the Reagan presidency, in which the senator intimated to Soviet leaders that Mr. Reagan was more receptive to arms limitation than in fact he was. The spot then cuts to Rep. Corcoran, standing beside an American flag. "Congressman Tom Corcoran—an Illinois Republican America can count on."

A more controversial Corcoran spot, with an arm-waving, guttural voice: Jesse Jackson, the black Democratic presidential candidate, haranguing a crowd. When push comes to shove, Jesse Jackson knows he can count on Charles Percy," the

This refers to the briefing the senator gave Mr. Jackson before the Syrian trip that freed U.S. Star Robert Goodman. Although President Reagan publicly thanked Mr. Jackson at the White House, Rep. Corcoran nevertheless argues that Sen. Percy shouldn't have got involved in the quibbling venture of a Democratic presidential candidate.

Sen. Percy charges the spot has "racist implications," and sides despite it as an attempt to win white ethnic voters in the Chicago area, where racial tensions were heightened by last year's election of Harold Washington, a black, as Chicago mayor. Rep. Corcoran denies the charge but acknowledges that he is focusing his campaign on Cook County, which casts roughly 30% of the vote in a typical Illinois Republican primary, and the surrounding "collar counties."

The ad referring to Jesse Jackson has drawn editorial criticism. And efforts by some Jewish contributors to defeat Sen. Percy have generated a sympathy backlash.

## Israel Issue

These contributors are angry that the senator quickly criticized Israel's invasion of Lebanon in 1982 and, over the years, has shown some sympathy for the claims of Palestinians. Morris Aronson, the former executive director of the American Israel Public Affairs Committee, is supporting Mr. Corcoran in the primary, though he would back Democratic Rep. Paul Simon in the general election. And a fund-raising letter from Louis A. Morgan, a Northfield, Ill., business executive, has portrayed Sen. Percy as "Israel's most powerful adversary" in the Senate. But in response to such tactics, former New York Sen. Jacob Javits and 58 Illinois Jewish leaders recently signed a letter defending the senator.

In the closing weeks of the campaign, Mr. Corcoran will hammer on the theme that Sen. Percy is more liberal than the average Republican voter or President Reagan. "Chuck's always been pretty good at keeping a bushel basket over his voting record," he says. In response to the Corcoran charge that he isn't a true Republican, the senator demands, "Who is he—God or someone?" In any case, the challenger's task has been complicated by Mr. Reagan himself.

The president lauded the senator as "a major American statesman and an outstanding salesman for Illinois" at a January 1983 fund-raising dinner. Rep. Corcoran, an unde-

clared candidate at the time, held his own counter-dinner in the same hotel. But Mr. Reagan didn't drop by, not even after Corcoran's brothers stamped on the floor to get his attention. The president did declare his sympathy once Mr. Corcoran had formally entered the race, but the damage had been done. Today, the "outstanding salesman" statement is the centerpiece of a Percy television commercial.

## Ties to Reagan

In other ways, too, the senator daffily wraps himself in the Reagan mantle. "All those who think the president did the right thing in going into Granada, say 'Aye!'" he directs his audience, and promptly votes aye himself. "We" have stopped the spread of communism in the Caribbean, "we" have cut spending and "we" have cut taxes, he says. "Finish the job! That's why he's running, and that's why I'm running."

Trying to avoid the issue of predecessors

Fulbright and Church, Sen. Percy argues that his Foreign Relations chairmanship is more than just a ticket to champagne receptions in faraway capitals. In fact, he says, it is "the Illinois advantage." It allows him to promote Illinois exports and to wring more defense contracts out of the Pentagon.

His sights are lower now, the senator seems to say as he shuttles consistently between the Chicago megalopolis and the downstate cornfields. The White House dream is behind him. And he has changed his mind about some things, including the virtues of being a senior senator.

"I can well remember the day I walked into Sen. Dirksen's office as a freshman and said, 'Ev, there's got to be a better way than this seniority system,'" he told a Springfield audience. "And Everett Dirksen said, 'Chuck, the longer you're here the more the system will grow on you.'"

"What a man of foresight and vision!"

## Dixon Ticonderoga Co.

VERO BEACH, Fla.—Dixon Ticonderoga Co. said it sold its plant properties in Jersey City, N.J., to Dixon Venture, a development partnership, for \$3 million in cash and notes.

Proceeds were used to reduce bank debt, the company said.

Dixon Ticonderoga, a pencil, art material, crayon and real-estate development concern, said that it leased back for two years one of the plants, which is used for manufacturing industrial crayons and graphic leads.

WASHINGTON POLITICAL ACTION COMMITTEE

TELEPHONE  
202 347-6012

WASHINGTON, D.C. 20001

2-24-84

[illegible]

Kim -

The identifiable Republicans  
are circled - for your  
convenience! (but no one  
makes a move without my o.k.)

Wam

PAID  
U.S. POSTAGE  
BULK RATE  
Permit No. 5265  
Milwaukee, Wis.

Michael Goland  
P.O. Box 59072  
#807  
Chicago, IL 60659

# Charles Percy— FRIEND OR FOE OF ISRAEL?



Sen. Charles Percy with Saudi  
Arabian Ambassador Faisal Alhegelan.

Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

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# **SOME QUESTIONS & SOME ANSWERS ABOUT THE PERCY RECORD.**

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## **1 ■ Is Charles Percy a friend of Israel?**

Let's look at the facts—

On one hand, in his 17 years in the Senate, Percy has supported foreign aid, including aid to Israel, and has worked on behalf of Soviet and Ethiopian Jews. But, at the same time, Percy led the Senate fights for the sale of deadly F-15 fighter bombers and, later, sophisticated AWACS aircraft to Saudi Arabia; called for a Palestinian state headed by Yasser Arafat; opposed additional aid to Israel; and was the first Senator to urge the suspension of the sale of F-16s to Israel.

Which leads to a second question...

## **2 ■ Has Charles Percy changed his position on Israel in recent years?**

Yes. Until early 1975, Percy was regarded as consistently pro-Israel. But upon his return from a tour of the Middle East, he made a 180-degree switch calling Yasser Arafat a "relative moderate" and branding Israel as "intransigent." These Percy positions have continued since 1975 on a series of Middle East issues.

## **3 ■ How important was Charles Percy in the AWACS fight in Congress?**

Percy led the bitter fight to sell the ultra-sophisticated AWACS aircraft to Saudi Arabia. The night the AWACS sale was approved, Charles Percy left the Senate chamber to attend a victory celebration at the home of the Tunisian ambassador. In his book, *Arab Reach*, Hoag Levins described the scene at the Embassy.

After months of vicious debate and brutal political infighting, the Senate had cast a momentous 52-48 vote in favor of the Arabs and against Israel. And throughout the night, the halls resounded with the glee of a crowd whose members told and retold the story, and toasted and retoasted the defeat of Israel.

Some of the loudest toasts were from John Tower, Chairman of the Senate Armed Services Committee, and Charles Percy, Chairman of the Senate Foreign Relations Committee. Each had played a crucial role in undercutting the Israel lobby's campaign during the bruising months of struggle. Tower and Percy threw their arms around each other as the Arab banquet crowd cheered.

"Here was the great guy," said Percy, hefting his champagne goblet to Tower.

Tower hoisted his own goblet to Percy. "Here was our leader," he said, beaming.

4

## What are Percy's views on Arafat and the P.L.O.?

Percy characterizes Arafat as a "relative moderate" compared to George Habash, the mastermind of the Munich massacres. In 1980, Percy visited Moscow and met with Kremlin leaders. U.S. Embassy cablegrams revealed that Percy told the Soviet officials that he favored an Arafat-led Palestinian state because, "this would permit Arafat to realize his wish to be chief of state."

5

## Does Charles Percy always support aid to Israel?

No. Since becoming chairman of the Senate Foreign Relations Committee, Percy has at times opposed increases in the aid figures. Consider these examples from just 1982 when Percy:

- Pledged on "Face the Nation" to cut aid levels to Israel already approved by a majority of his own Foreign Relations Committee;
- Opposed the Boschwitz Amendment to convert \$300 million in loans to Israel to grants for Israel;
- Opposed the Cranston Amendment to add \$125 million in economic assistance to Israel;
- Voted against an amendment allowing an additional \$225 million in foreign aid to Israel.

6

## Have Percy's Arab business dealings influenced his position on Middle East issues?

This is a hard question to answer definitively. Percy sits on the board of Chase Manhattan Bank and other banks that have interests with the Saudis and other Arab governments. And in 1976, Percy led the fight to block disclosure of the extent of Arab countries' deposits in American banks. These two facts may or may not be related. You must decide.

7

## Is it better to support Percy and hope he changes—or work to defeat him in 1984?

Again, this is something for you to decide. What seems clear is that Charles Percy is not likely to change. The last time he ran for re-election, Percy was in trouble in Illinois and within the Illinois Jewish community. On the eve of the election, he admitted that he had made mistakes and promised to change. The Percy record over the last five years suggests that was an empty promise, including his recent castigation of Israeli policies to Prime Minister Shamir during his visit to Washington.

Most political observers believe that Percy is facing the most serious challenge of his political life. He faces a strong challenge in the Republican primary and, if he survives, he must face one of four Democrats—all of whom have the ability to run a strong Illinois campaign and all of whom would probably be more supportive of closer U.S.-Israel ties.

By now you have probably heard a lot about the record of Charles Percy on the State of Israel. And you may be confused because of the conflicting stories you've been told. Those who support Charles Percy's re-election to the Senate offer one description of his record while those who oppose his re-election present a quite different set of facts.

By now you may be wondering what the truth really is—where Charles Percy really stands on the issue of a close U.S.-Israel friendship.

While Percy's position on the Middle East is not the only issue confronting Illinois voters, it is certainly worthy of very close attention. For Charles Percy's influence as Chairman of the Senate Foreign Relations Committee is enormous and his actions have a tremendous effect on the quality of the U.S.-Israel relationship.

To clear up the confusion, we asked some direct and important questions about what Charles Percy has said and done in his 17 years in the Senate.

**What we found is contained  
inside—  
and it shows that while Percy  
claims he is not a foe,  
he is certainly no friend . . . .**

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TELEGRAM

HAND DELIVERED

SECRETARY OF THE SENATE RPT DLY MGM, DLR  
 119 D ST NORTH EAST  
 WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 90,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES W PERCY, TO ACHIEVE THIS  
 I PAID \$27,639.50 TO A B DATA LTD 8050 NORTH PORT WASHINGTON ROAD  
 MILWAUKEE WISCONSIN 53217

MICHAEL GOLAND  
 20221 PRARIE ST  
 CHATSWORTH CA 91311

14:53 EST

IPMPOMX WSH

RECEIVED  
 CLERK OF THE SENATE  
 15 MAR 15 PM 5:00  
 HAND DELIVERED

85040511686

4-034596S074 03/14/84 ICS IPMBNGZ CSP POMH  
 8183493661 TORN CHATSWORTH CA 39 03-14  
 0316P EST 15:17 EST

**Western Union**

**Telegram**

SECRETARY OF SENATE RPT DLY MGM, DLR ASAP  
 19 D ST NE  
 WASHINGTON DC 20510

RECEIVED  
 APR 14 3 PM 2 51  
 HAND DELIVERED

MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 300,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY, TO ACHIEVE THIS  
 PAID \$100,000 TO C. L. C. O, INC, 2525 WILSON BOULEVARD, ARLINGTON,  
 VIRGINIA 22201.  
 MICHAEL GOLAND  
 20221 PRAIRIE ST  
 CHATSWORTH CA 91311

15:17 EST

IPMPOMX WSH

I 47 · 4/3/84

## Illinois Citizens for Political Integrity

P.O. Box 9534

Downers Grove, IL 60515



Dear Illinois friend:

I want a conservative U.S. Senator elected in 1984 to help Ronald Reagan. You may not know, me, I'm Robert Knabe - a Chicago Reagan supporter - and I was shocked to learn recently just how liberal Chuck Percy really is.

It may surprise you to learn the truth, but every six years Chuck Percy campaigns as a conservative to convince you that he's not a liberal. He is a liberal, he's no friend of Ronald Reagan, and he doesn't represent Illinois.

As Chairman of the Senate Foreign Relations Committee, he's the most powerful man in Congress on foreign policy. When you look at his record, you'll know we need to replace him in the U.S. Senate.

There is an alternative - a real choice for our U.S. Senator. He's Congressman Tom Corcoran, a genuine Reagan Republican.

Illinois State Representative Penny Pullen said in endorsing Tom Corcoran,

"Percy represents the failed policies of the past. Corcoran is a staunch defender of America's interests in foreign affairs and national defense."

Nationally syndicated columnist M. Stanton Evans said,

"Senator Percy is out of touch. If you simply examine his issue positions...it is very clear not only that Percy's issue positions are out of step with the stated positions of the Reagan Administration, but with majority public sentiment as well."

Let's look at just a few issues - and Chuck Percy's stands:

- \* Mr. Percy cast the deciding vote in the Senate against Ronald Reagan's 1984 budget - resulting in higher spending and deficits.
- \* Mr. Percy voted for the high tax bill which contained the 10% withholding tax on interest and dividends.
- \* Mr. Percy voted to give \$75 million to Marxist Nicaragua, and called for diplomatic recognition for Fidel Castro's Cuba.
- \* Mr. Percy voted to give away our Panama Canal.
- \* Mr. Percy opposes President Reagan's efforts to enact a school prayer Amendment to our Constitution.
- \* Mr. Percy opposed efforts to end forced busing to achieve racial quotas in our schools.

Mr. Percy undermines Ronald Reagan's peace efforts in the Middle East by referring to the terrorist Yassir Arafat as "moderate."

When challenged on his liberal voting record in 1978 by his Democrat opponent - who was more conservative - Mr. Percy knew he was in trouble.

He called in Ronald Reagan to ask him to save Percy's Senate seat.

This was the same Chuck Percy who in 1975 had called Ronald Reagan a man with "neither an adequate understanding of complex national and international issues," nor "the required vision" to be president.

Mr. Percy promised he'd learned his lesson - he'd mend his ways by listening to the people if they would only re-elect him Senator. He promptly forgot the promise.

To repay Ronald Reagan for his 1978 help, Chuck Percy helped Mr. Reagan's opponent for the presidency in 1980! After the Republican convention nominated Reagan for President, Mr. Percy and his wife both donated \$500 to John Anderson's independent candidacy against Reagan.

FURTHER REPAYING RONALD REAGAN, CHUCK PERCY SUPPORTED JIMMY CARTER MORE THAN HE HAS RONALD REAGAN AS PRESIDENT.

Unfortunately for Mr. Percy, Illinois voters have a longer memory than he does. Another Illinois president - Abraham Lincoln - wrote,

"You can fool some of the people some of the time,  
but you can't fool all of the people all of the time."

Those who believed Chuck Percy's 1978 promise to reform were fooled. They didn't appreciate it - not a bit!

They won't be fooled again. Chuck Percy will never again win their votes. He can't win without them. If nominated, he'll lose in November.

So, Illinois Republicans have a choice We can nominate Chuck Percy - a sure loser in November - OR WE CAN NOMINATE CONGRESSMAN TOM CORCORAN - A MAN WHO WILL WIN THE NOVEMBER ELECTION!

Of course, Illinois Republicans want more than just a Senator.

WE WANT A SENATOR WHO VOTES IN WASHINGTON LIKE HE TALKS IN ILLINOIS!

WE WANT A SENATOR WHO WILL BE LOYAL IN SUPPORTING RONALD REAGAN!

WE WANT A SENATOR WHO SUPPORTS LOWER TAXES, LOWER FEDERAL SPENDING AND OPPORTUNITY FOR US, OUR CHILDREN AND OUR GRANDCHILDREN.

WE WANT TOM CORCORAN!

Few Congressmen have made more impact on important legislation in Washington than this 44-year-old, four-term Representative.

A native of Ottawa, Illinois, Tom Corcoran graduated from Notre Dame University, served as an officer in the U.S. Army, became a successful businessman and is the father of five children.

Tom Corcoran is not a career politician. He was Vice-President of the Chicago and North Western Railroad when he decided he should be helping make America great again as a citizen-legislator.

Tom Corcoran defeated a liberal Democrat in 1976 to win his seat  
more...

in Congress, but he's been far more than a seat warmed in the House.

Since his election, Tom Corcoran voted just like he promised to vote. He has a solidly conservative, pro-defense, pro-energy, pro-family and pro-America voting record which has re-elected him with large margins.

Tom Corcoran has earned his pay - even though he voted against raising it. MULTI-MILLIONAIRE CHUCK PERCY VOTED TO RAISE HIS OWN PAY!

Tom Corcoran serves on the important Energy and Commerce Committee where he is credited with stopping the legislation which would have greatly increased natural gas prices without adding to gas supplies.

His pro-energy achievements are helping us to have the energy we need to heat our homes, fuel our cars and keep our jobs, but he's done much, much more for us and this nation.

HE WAS ONE OF THE MOST EFFECTIVE ADVOCATES OF THE REAGAN TAX CUTS WHICH REDUCED YOUR PERSONAL INCOME TAXES BY 25% OVER THE LAST 3 YEARS.

TOM CORCORAN CONSISTENTLY SUPPORTS LIMITING THE GROWTH OF FEDERAL SPENDING TO TRY TO BALANCE THE FEDERAL BUDGET.

CONGRESSMAN CORCORAN SUPPORTS THE CONSTITUTIONAL AMENDMENT TO BALANCE THE BUDGET. HE'S FED UP WITH \$200 BILLION DEFICITS EACH YEAR.

When liberals like Chuck Percy voted higher taxes in 1982 with the promise of lowering spending by \$300 billion, Tom Corcoran voted "NO!"

He knew there would be no spending cuts, only tax hikes. He was right. TOM CORCORAN AGREES WITH PRESIDENT REAGAN'S STATEMENT,

"PEOPLE AREN'T TAXED TOO LITTLE - GOVERNMENT SPENDS TOO MUCH."

Instead of cutting spending and deficits as Percy promised, the 1982 deficit of \$110 billion grew to \$194 billion in 1983. Clearly the big taxing Chuck Percy doesn't represent you. Tom Corcoran does.

Chuck Percy claims to be a Republican - but you be the judge!

Mr. Percy voted with the Republican Party 42.8% of the time.

Mr. Corcoran voted with the Republican Party 83.8% of the time.

Who best represents you in Washington - Chuck Percy or Tom Corcoran?

If you want to elect as your Senator a solid, proven, loyal Reagan conservative with the integrity you admire in political office, Tom Corcoran is your choice.

If you want a respected Republican - a firm supporter of President Reagan - a Senator who will help stop the massive national disgrace in deficit spending by the liberals, Tom Corcoran is your man.

The Republican primary in Illinois is on Tuesday, March 20, 1984.

more...

That's not far away, so mark March 20th on your calendar.

TOM CORCORAN NEEDS YOU. HE NEEDS YOUR VOTE. HE REALLY DOES!

You see, Chuck Percy has a massive warchest he's using to try to fool the voters of Illinois again into thinking he's really a conservative. He's trying to make the people think he supports Ronald Reagan - again.

Tom Corcoran - the real Reagan supporter in Congress - has limited funds for his campaign. He has run a campaign of the people, and that means that only with the help of men and women like you all across the state of Illinois - taking the time and effort to vote - can he win.

So, please complete the TOM CORCORAN SUPPORT FORM right now, and return it to me today in the return envelope I've also enclosed for your easy use. I'm not asking you to donate, just to support Tom with your vote and help in getting friends, neighbors and relatives to vote for Tom as well.

Here's what YOU CAN DO - TODAY!

1. Complete and return the enclosed TOM CORCORAN SUPPORT FORM.
2. TELL YOUR FRIENDS AND OTHERS ABOUT TOM. GET THEM TO THE POLLS ON ELECTION DAY - TUESDAY, MARCH 20, 1984.
3. Volunteer to help TOM CORCORAN be elected U.S. Senator.

Please don't allow this day to end without completing and returning your TOM CORCORAN SUPPORT FORM in the enclosed return envelope.

Remember, your effort today will help America's tomorrows to be blessed with freedom, economic prosperity and integrity in political office.

Thank you for your concern - and your efforts. With deep appreciation, I remain

Most sincerely yours,

  
Robert Knabe

P.S. We worked hard to nominate Ronald Reagan in 1976 and to elect him in 1980. Now we must work to re-elect him - and to send him a U.S. Senator who will support his policies. That means Congressman Tom Corcoran, a loyal Reagan supporter. The winning ticket for 1984 is REAGAN-CORCORAN!

P.P.S. Don't forget - primary election day is Tuesday, March 20, 1984.

## Tom Corcoran Support Form

Dear Robert:

I agree with you that our U.S. Senator must be a man of integrity, one on whom we can rely to vote the same way in Washington, D.C. as he says he will in Illinois.

I know that Chuck Percy promised to listen to the people in 1978, only to forget us when he returned to his comfortable Senate seat.

I want the Republican Party to control the U.S. Senate, and I understand that Illinois voters aren't going to be fooled by Percy again. I want to nominate a conservative who can be elected in November and who can help President Reagan win the election.

Tom Corcoran is the type of conservative leader Republicans can rely on to be consistent. He's a man of genuine integrity.

☐ I'll vote for Tom Corcoran on primary election day - Tuesday, March 20, 1984.

☐ I'll tell my friends, neighbors and family members about Tom's campaign - and help them to get out to vote on primary day.

☐ I'll volunteer to help Tom Corcoran's campaign for the U.S. Senate. Please contact me at the address (or phone number) below.

☐ I've listed the names and addresses of others I think will help Tom Corcoran win the U.S. Senate seat this year.

Please Print.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Federal Election Commission regulations require that we ask the following information.

Occupation: \_\_\_\_\_

Business firm: \_\_\_\_\_

★ ICPI, P.O. Box 9534, Downers Grove, IL 60515 ★

Paid for by Michael Goland, and not authorized by any candidate or candidate's committee.

85040511692

FROM: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PLACE  
STAMP  
HERE

Illinois Citizens for Political Integrity

P.O. Box 9534  
Downer's Grove IL 60515



Illinois Citizens for Political Integrity  
P.O. Box 9534  
Downer's Grove IL 60515

*Deputy  
Postmaster  
Chicago, IL 60601*



US POSTAGE  
PAID  
Permit #3402  
CHICAGO, IL

DULK RATE

PLEASE OPEN  
IMMEDIATELY!  
ILLINOIS IS  
COUNTING ON YOU!

2 6 9 1 1 5 0 4 0

| Name of Committee (in Full)   | Outstanding Balance Beginning This Period | Amount Incurred This Period | Payment This Period | Outstanding Balance at Close of This Period |
|---|---|-----------------------------|---------------------|---|
| <b>Corcoran for Senate Committee</b>  |   |                             |                     |   |
| A. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>Savin Corporation<br/>1400 E. Higgins Rd.<br/>Elk Grove Village, IL 60007</b>  | 400.00                                    | 1,012.46                    | -0-                 | 1,412.46                                    |
| Nature of Debt (Purpose):<br><b>Copier rent &amp; supplies</b>  |   |                             |                     |   |
| B. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>SPRINT Communications Corp.<br/>P. O. Box 974<br/>Burlingame, CA 94010</b>     | 500.00                                    | 1,424.22                    | 970.86              | 953.36                                      |
| Nature of Debt (Purpose):<br><b>Des Plaines office phone</b>  |   |                             |                     |   |
| C. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>United Envelope Corp.<br/>1200 S. Sterling Blvd. #A<br/>Sterling, VA 22170</b> | -0-                                       | 1,531.45                    | -0-                 | 1,531.45                                    |
| Nature of Debt (Purpose):<br><b>Printing</b>  |   |                             |                     |   |
| D. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>The Viguerie Company<br/>7777 Leesburg Pike<br/>Falls Church, VA 22043</b>     | -0-                                       | 3,609.58                    | 2,000.00            | 1,609.58                                    |
| Nature of Debt (Purpose):<br><b>Mailing service</b>   |   |                             |                     |   |
| E. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>United Air Lines<br/>P. O. Box 66100<br/>Chicago, IL 60666</b>                 | 11,079.97                                 | -0-                         | -0-                 | 11,079.97                                   |
| Nature of Debt (Purpose):<br><b>Airplane travel</b>   |   |                             |                     |   |
| F. Full Name, Mailing Address and Zip Code of Debtor or Creditor<br><b>A. B. Data, Inc.<br/>8050 N. Port Washington Rd.<br/>Milwaukee, WI 53217</b>   | 10,000.00                                 | 53,800.00                   | 23,800.00           | 40,000.00                                   |
| Nature of Debt (Purpose):<br><b>Mailing service</b>   |   |                             |                     |   |
| 1) SUBTOTALS This Period This Page (optional) . . . . .   |   |                             |                     | \$56,586.82                                 |
| 2) TOTAL This Period (last page this line only) . . . . .   |   |                             |                     |   |
| 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) . . . . .   |   |                             |                     |   |
| 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)   |   |                             |                     |   |

85040511694



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)

**CORCORAN FOR SENATE COMMITTEE**

|   |   |   |  |
|---|---|---|--|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br>Sigma Press<br>Rt. 23 & I-80<br>Ottawa, IL 61350                     | <b>Purpose of Disbursement</b><br>Campaign Printing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br>6-27-83 | <b>Amount of Each Disbursement This Period</b><br>\$949.38   |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br>Wolf C. Dietrich<br>6819 Harvest Ave.<br>Woodridge, IL 60517         | <b>Purpose of Disbursement</b><br>Reimbursement for travel expense<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$238.49   |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br>Illinois Bell<br>225 W. Randolph<br>Chicago, IL 60606                | <b>Purpose of Disbursement</b><br>Campaign Phone<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                   | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$700.91   |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br>Pitstick's Pavillion<br>Route 2<br>Ottawa, IL 61350                  | <b>Purpose of Disbursement</b><br>Fundraiser Dinner<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$437.33   |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br>River St. Press<br>149 S. River<br>Aurora, IL 60506                  | <b>Purpose of Disbursement</b><br>Campaign Printing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$543.34   |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br>Advertising Specialities, Inc<br>331 E. Superior<br>Ottawa, IL 61350 | <b>Purpose of Disbursement</b><br>Campaign Paraphernalia<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$312.97   |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br>U.S. Postmaster<br>Aurora, IL 60507                                  | <b>Purpose of Disbursement</b><br>Campaign Postage<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$500.00   |
| <b>H. Full Name, Mailing Address and ZIP Code</b><br>Cedric Spring & Assoc.<br>113 E. Main St.<br>St. Charles, IL 60174   | <b>Purpose of Disbursement</b><br>Campaign Paraphernalia<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br>6-30-83 | <b>Amount of Each Disbursement This Period</b><br>\$419.10   |
| <b>I. Full Name, Mailing Address and ZIP Code</b><br>A. B. DATA<br>8050 N. Port Washington Rd.<br>Milwaukee, WI 53217     | <b>Purpose of Disbursement</b><br>Campaign Mailing<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                            | <b>Date (month, day, year)</b><br>6-17-83 | <b>Amount of Each Disbursement This Period</b><br>\$2,000.00 |
| <b>SUBTOTAL of Disbursements This Page (optional)</b>   |   |   | \$6,101.52   |
| <b>TOTAL This Period (last page this line number only)</b>  |   |   |  |

3085014629647

ITEMIZED DISBURSEMENTS

Page 2 of 41 for  
LINE NUMBER 17  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

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

Committee (in Full)

SEN FOR SENATE COMMITTEE

|  |   |                                       |   |
|--|---|---------------------------------------|---|
| Name, Mailing Address and ZIP Code<br>State<br>Port Washington<br>Wis, WI 53217                  | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-16-83 | Amount of Each<br>Disbursement This Period<br>\$6,000.00  |
| Name, Mailing Address and ZIP Code<br>State<br>Port Washington<br>Wis, WI 53217                  | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$12,000.00 |
| Name, Mailing Address and ZIP Code<br>State<br>Port Washington<br>Wis, WI 53217                  | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$646.72    |
| Name, Mailing Address and ZIP Code<br>State<br>Holtman<br>Madena Dr.<br>Mery, IL 60538           | Purpose of Disbursement<br>Aurora Office rent<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Date (month,<br>day, year)<br>7-21-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |
| Name, Mailing Address and ZIP Code<br>State<br>is Bell<br>Rafzolph<br>p, IL 60606                | Purpose of Disbursement<br>WATS service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):        | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$240.61    |
| Name, Mailing Address and ZIP Code<br>State<br>is Bell<br>Rafzolph<br>p, IL 60606                | Purpose of Disbursement<br>Aurora Office phone<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,522.94  |
| Name, Mailing Address and ZIP Code<br>State<br>ietrich<br>arvest Ave.<br>age, IL 60517           | Purpose of Disbursement<br>consultant fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,875.00  |
| Name, Mailing Address and ZIP Code<br>State<br>Computer Center<br>Lincolnway<br>Aurora, IL 60542 | Purpose of Disbursement<br>computer supplies<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$346.48    |
| Name, Mailing Address and ZIP Code<br>State<br>Sauci Dr.<br>IL 60506                             | Purpose of Disbursement<br>consultant fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |

Total Disbursements This Page (optional) ..... \$23,231.75

This Period (last page this line number only) .....

4—Section 1 Thursday, July 7, 1983 THE DAILY HERALD

# Corcoran calls Percy Israel's foe

WASHINGTON (AP) — Illinois Sen. Charles H. Percy is under attack as Israel's most powerful adversary in the Senate in an expanded replay of a political fund-raising drive that figured heavily in the defeat of Downstate Rep. Paul Findley last year.

"More than any other officeholder in Washington, Percy has worked to destroy the special relationship between the United States and Israel," says a letter sent to more than 50,000 Jewish campaign contributors nationwide on behalf of the senator's primary challenger, Rep. Tom Corcoran, R-Ill.

It resembles fund-raising appeals that amassed thousands of dollars for U.S. Rep. Dick Durbin, D-Ill., who unseated Findley in 1982 after the GOP lawmaker's Mideast views angered Jewish contributors.

"THEY'RE REALLY SHARPENING the knives," Findley, now a Washington writer and lecturer, said after hearing of the attack on the Senate



Charles Percy



Tom Corcoran

Foreign Relations Committee chairman. "I hate to see Chuck Percy on the receiving end."

Corcoran, press secretary Scott McMurray said the 50,000 fund-raising packets, fashioned by direct mail expert Jerry Benjamin of Milwaukee, a Durbin consultant in 1982, were mailed

June 18 and have "exceeded expectations."

"You can tell by the fact that we're mailing more of them that we're making money," McMurray said of the letter signed by Northfield, Ill., businessman Louis A. Morgan, a leading Durbin fund-raiser who is now heading

Corcoran's drive in the Jewish community.

The two camps are at odds over specifics in the letter.

It says Percy "led the battle" in 1979 for Senate approval of a sale of F-16 fighters to Saudi Arabia and "followed up on that outrage" in 1981 when he "pushed through" the sale of AWACS radar planes to the Saudis.

PERCY BACKED BOTH plans, but Foreign Relations Committee Staff director Scott Cohen, a Percy supporter, argues that "led the battle" goes too far, and President Reagan "pushed through" the AWACS sale.

The letter says Percy "almost singlehandedly" blocked a shipment of F-16 warplanes to Israel last year. In fact, the Reagan Administration blocked the shipment when Israel went into Lebanon but has since released the planes, in both cases with Percy's support.



604 3353  
RECEIVED AT THE FEC

MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

84 MAY 23 PM: 2:24

CENTURY CITY OFFICE

1888 CENTURY PARK EAST

SUITE 2100

LOS ANGELES, CALIFORNIA 90067

TELEPHONE (213) 556-1800

SAN FRANCISCO OFFICE

100 BUSH STREET

SUITE 2314

SAN FRANCISCO, CA 94104

TELEPHONE (415) 391-7540

LOS ANGELES OFFICE

811 WEST SEVENTH STREET

TWELFTH FLOOR

LOS ANGELES, CALIFORNIA 90017

TELEPHONE (213) 578-4414

May 23, 1984

Mur 1684  
Brown

HAND DELIVERED

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

MUR 1684

Dear Mr. Gross:

This letter is to confirm our understanding regarding the above captioned MUR. Duane Brown has informed us that your records confirm that Mr. Goland received a copy of the complaint on May 7, 1984. His response on whether the Commission should find reason to believe was therefore due on May 22.

Stephen Nissen of our Los Angeles office spoke with Mr. Brown on Friday, May 18 and requested an extension of time in which to respond. However, there appears to have been some confusion as to the date on which the response was due. This confusion led to a misunderstanding as to what was being agreed. It was our intention to request a fifteen-day extension from May 22 until June 6; the extension granted was until May 28.

Mr. Goland will be out of the country until after May 29. It will be impossible for us to submit a complete response and supporting affidavits until after his return. For this reason, we request that our original request for a full fifteen-day extension from May 22 until June 6 be granted.

Thank you for your consideration.

Sincerely,

David M. Ifshin

DMI/jhl

cc: Duane Brown ✓

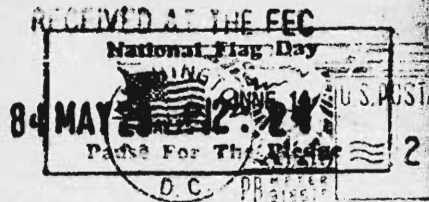
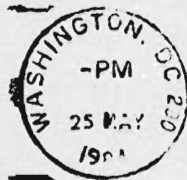
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NDALÉ

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



MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

*J. Brown*

May 23, 1984

HAND DELIVERED

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

MUR 1684

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Thank you for your consideration.

Sincerely,

*[Signature]*  
David M. Ifshin

DMI/jhl

cc: Duane Brown

RECEIVED AT THE FEC  
**HAND DELIVERED**

MAY 24 P 3: 08

GOL#3216

CENTURY CITY OFFICE

1888 CENTURY PARK EAST

SUITE 2100

LOS ANGELES, CALIFORNIA 90067

TELEPHONE (213) 586-1600

SAN FRANCISCO OFFICE

100 BUSH STREET

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SAN FRANCISCO, CA 94104

TELEPHONE (415) 981-7540

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511 WEST SEVENTH STREET

TWELFTH FLOOR

LOS ANGELES, CALIFORNIA 90017

TELEPHONE (213) 879-4414

AL2: 16

85040511702

# MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

CHARLES E. MANATT,\*  
THOMAS E. PHELPS,  
ALAN L. ROTHENBERG,  
JOHN V. TUNNEY  
L. LEE PHILLIPS,\*  
BARNET RUTHER,  
WILLIE R. BARNES,  
MICHAEL KANTOR,\*  
LESLIE S. KLINBER,  
MARTIN M. JELENNIO  
JOSEPH MORADIAN II,  
ARNOLD R. SCHUSTER,  
RONALD J. SILVERMAN,\*  
GEORGE DAVID KIEFFER,  
GORDON H. BANA,  
MARC EPSTEIN,  
RICHARD LEE AUGUST,  
DAVID S. GREENFIELD,  
THOMAS E. McLANE,  
JOHN R. STUART,  
PAUL J. MALL,  
MARA G. HUMMER,\*  
DAVID S. JACOBSON,\*  
HAROLD E. ROSSER, JR.,  
R. BARRY SCHUCHET,\*  
DAVID JANE LARGO,  
PETER T. PATERNIO,  
NEAL L. PETERSEN,  
ROSS T. SCHWARTZ,

LISA SPECHT,  
ROBERT L. MURPHY,  
BARRY M. LAWRENCE,  
BENJAMIN TEVREMAN,  
KEITH T. HOLMES,  
TIMOTHY R. FURLONG,\*  
STEPHEN D. BROTHMAN,  
DONALD J. FITZGERALD,  
STEVEN A. NISSEN,\*  
LAWRENCE J. ULMAN,  
JOHN S. EMBERTON,  
WILLIAM T. QUICKSILVER,  
STEVEN M. GOLDBERG,  
WILLIAM D. SHIMOLD,  
SHIRLEY M. R. SCHWARTZ,  
LAWRENCE J. SLAKE,  
DAVID R. HOLMAN,  
MARY E. DOYLE,  
MATTHEW S. STEINBERG,  
DENNIS M. JOHNSON,  
LAURENCE M. MARKS,  
BARBARA J. SCHLAIN,  
BENNY E. LONG,\*  
NATHALEEN GUENNEVILLE,  
MUSHMANO SOHAIJ,  
ARN H. TELLEN,  
JANE L. ELLISON,  
LESLIE A. SWAN

JOHN W. COCHRANE,  
RICHARD A. KALE,  
BARBARA J. SPERMAN,  
DAVID W. GELBERMAN, JR.,  
EUGENE THOMAS,  
CAROL LAURENCE MAYALL,  
JUDY E. GRAMHAM,  
DIANE J. GIDEON,  
DANIEL L. APPELMAN,  
ELIZABETH WATSON,  
PHILIP R. RECHT,  
ROBERT LANE CARRICK,  
ROBERT S. BRUNER,  
CARY H. THOMPSON,  
HELEN L. DELANEY-TOMAHINE,  
STEVEN M. SIKENS,  
MATTHEW R. GULTER,  
BRAD A. MORRICE,  
ROBERT DOUGLAS LEE,  
CHARLES M. SHUMAKER II,  
TIMOTHY J. HOY,  
JONATHAN L. KIRSCH,  
TOR R. BRADSHAW,  
DAVID BRADSHAW,  
MARGARET G. CASEY,  
CLARE BRONOWSKI,  
ROSE D. ORS,  
JOHN M. ALONDI,  
MICHAEL A. FIRESTEIN

11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90084

TELEPHONE (213) 312-4000

TELEX 218853

CABLE MANATOP LSA

FAX (213) 478-0555

May 18, 1984

OF COUNSEL:  
LEE S. GELMAN,  
WILLIAM S. HUMPHREY,  
PETER A. VESPER,  
DAVID S. FINE

## WASHINGTON, D.C. OFFICE

1200 NEW HAMPSHIRE AVE., N.W.  
WASHINGTON, D.C. 20036  
(202) 463-4300

## SAN FRANCISCO OFFICE

4 EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 398-7840

## LOS ANGELES (DOWNTOWN)

811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-8800

\*MEMBER OF DISTRICT OF COLUMBIA AND CALIFORNIA BARS  
\*\*MEMBER OF DISTRICT OF COLUMBIA BAR  
OTHERS MEMBERS OF CALIFORNIA BAR  
† A PROFESSIONAL CORPORATION

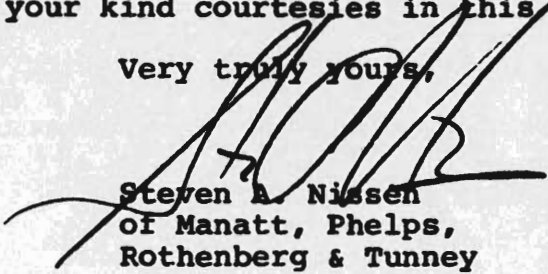
Duane A. Brown  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: Complaint of Senator Charles H. Percy  
Against Michael Goland

Dear Mr. Brown:

This letter will confirm our conversation of today, May 18, 1984, wherein this office, on behalf of Michael Goland, requested a ten day extension to respond to the above-referenced Complaint. We understand that we now have up to and including May 28, 1984 during which to respond to said Complaint. We thank you very much for your kind courtesies in this matter.

Very truly yours,

  
Steven A. Nissen  
of Manatt, Phelps,  
Rothenberg & Tunney

SAN:ldc

cc: Michael Goland  
David Ifshin✓

85040511703

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T. PHELPS. ROTHENBERG & TUNNEY

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

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

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MANATT, PHELPS, ROTHENBERG & TUNNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

CHARLES T. MANATT,\*  
THOMAS D. PHELPS,  
ALAN I. ROTHENBERG,  
JOHN V. TUNNEY  
L. LEE PHILLIPS,\*  
BARNET REITNER,  
WILLIE R. BARNES,  
MICHAEL KANTOR,\*  
LESLIE S. KLINGER,  
MARTIN M. JELENKO  
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ARNOLD R. SCHUSTER,  
RONALD J. SILVERMAN,\*  
GEORGE DAVID HIEPPER\*  
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PAUL J. HALL,  
MARIA D. HUMMER,\*  
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HAROLD E. ROGERS, JR.,  
K. BARRY SCHOCHET,\*  
MARY JANE LARSE\*  
PETER T. PATERNO  
NEAL L. PETERSEN,  
ROSS T. SCHWARTZ,

LISA SPECHT,  
ROBERT L. MURPHY,  
BARRY M. LAWRENCE,  
DICKMAN TEVRIZIAN,  
KEITH T. HOLMES,  
TIMOTHY R. FURLONG,\*  
STEPHEN D. GREENBERG,  
WILLIAM S. BRUNSTEN,  
DONALD J. FITZGERALD,  
STEVEN A. NISSEN,\*  
LAWRENCE J. ULMAN,  
JOHN B. EMERSON,  
WILLIAM T. QUICKSILVER,  
STEVEN M. GOLDBERG  
MASAHIRO SHIMOJO  
SHIRLEY M. K. BENNETT\*  
LAWRENCE J. BLAKE  
DIANE R. HOLMAN  
MARY E. DOYLE  
MATTHEW S. STEINBERG  
DENNIS M. JOHNSTON  
LAURENCE M. MARKS  
BARBARA J. SCHLAIN  
BENET E. LONG\*  
KATHLEEN QUENNEVILLE  
HUBERMAN SCHALI  
ARN H. TELLEN  
JANE L. ELLISON  
LESLIE A. SWAIN

JOHN W. COCHRANE  
RICHARD A. KALE  
BARBARA J. ZIPPERMAN  
DAVID W. CRUMPACKER, JR.  
EUGENE TANAKA  
CAROL LAURENE MAYALL  
JODY E. GRAHAM  
DIANE J. GIDEON  
DANIEL L. APPELMAN  
ELIZABETH WATSON  
PHILIP R. RECHT  
ROGER LANE CARRICK  
ROBERT S. GRUNER  
CARY M. THOMPSON  
HELEN L. DELANEY-YONAMINE  
STEVEN M. SIEMENS  
MATTHEW R. OULTER  
BRAD A. MORRICE  
ROBERT DOUGLAS LEE  
CHARLES M. SHUMAKER III  
TIMOTHY J. HOY  
JONATHAN L. KIRSCH  
TOR R. GRAHAM  
DARBY BRAGOW  
MARGARET O. CASEY  
CLARE BRONOWSKI  
ROSE D. ORS  
JOHN M. ALONGI  
MICHAEL A. FIRESTEIN

11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064

TELEPHONE (213) 312-4000

TELEX 215663  
CABLE MANATOP LSA  
FAX (213) 478-0665

May 18, 1984

mur 1684

OF COUNSEL:  
LEE E. COLTON,  
MALDON R. HARRISON,  
PETER H. WENNER,  
DAVID M. FRIED\*

WASHINGTON, D.C. OFFICE

1200 NEW HAMPSHIRE AVE., N.W.  
WASHINGTON, D.C. 20036  
(202) 462-4300

SAN FRANCISCO OFFICE

4 EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 398-7840

LOS ANGELES (DOWNTOWN)

WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 468-8800

\*MEMBER OF DISTRICT OF COLUMBIA AND CALIFORNIA BARS  
\*\*MEMBER OF DISTRICT OF COLUMBIA BAR  
OTHERS MEMBERS OF CALIFORNIA BAR  
† A PROFESSIONAL CORPORATION

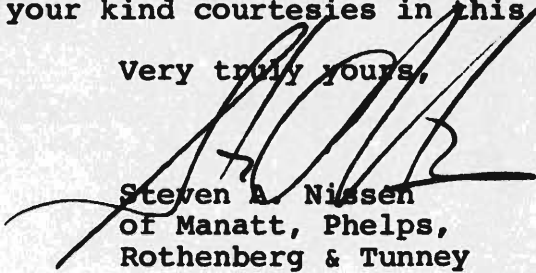
Duane A. Brown  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: Complaint of Senator Charles H. Percy  
Against Michael Goland

Dear Mr. Brown:

This letter will confirm our conversation of today, May 18, 1984, wherein this office, on behalf of Michael Goland, requested a ten day extension to respond to the above-referenced Complaint. We understand that we now have up to and including May 28, 1984 during which to respond to said Complaint. We thank you very much for your kind courtesies in this matter.

Very truly yours,

  
Steven A. Nissen  
of Manatt, Phelps,  
Rothenberg & Tunney

SAN:ldc

cc: Michael Goland  
David Ifshin

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355 WEST OLYMPIC BOULEVARD  
ANGELES, CALIFORNIA 90064

11355 WEST OLYMPIC BOULEVARD

LOS ANGELES, CALIFORNIA 90064

[illegible]

**SECRET**

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

RECEIVED AT THE FEC



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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1984

MEMORANDUM

TO: The File

FROM: Kenneth A. Gross  
Associate General Counsel

SUBJECT: MUR 1684  
Goland

On May 22, 1984, I received a call from Lyn Oliphant in behalf of David Ifshin who is co-counsel with Steve Nissan on the above matter. Ms. Oliphant was inquiring about a conversation that David Ifshin had with Duane Brown concerning an extension of time. There was some confusion as to when California counsel received notification. The confusion was clarified in that the notice was received on May 7, 1984, making the response due May 22, 1984. The respondent is requesting a 15 day extension which is agreeable. Ms. Oliphant indicated that Mr. Nissan would be sending a letter making that request. I spoke with Duane about this and we are all in understanding. I also mentioned the matter to Lois.

cc: Lois Lerner  
Duane Brown

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CORCORAN FOR SENATE COMMITTEE

P. O. BOX 2667 • AURORA, ILLINOIS 60507

600H 3212  
MUR 1684  
Brown

14 MAY 21 AIO: 25

May 18, 1984

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

Re: MUR 1684

Dear Mr. Steele:

This letter is written in response to your letter dated April 30, 1984 and the complaint filed by Senator Charles H. Percy ("Percy") and Citizens for Percy '84 ("Citizens") against, inter alia, the Corcoran for Senate Committee ("Committee"). 2 U.S.C. §437g(a). Percy and Citizens contend that the Committee violated the Federal Election Campaign Act of 1971, as amended, by cooperating and consulting with Michael Goland ("Goland") who made independent expenditures on behalf of the Committee. Percy and Citizens allege that Goland made the expenditures at the direction of Morris Amitay ("Amitay") who allegedly "was both an agent of and fundraiser for the Corcoran campaign" and "was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs." See Complaint at 2. Percy and Citizens acknowledge that their complaint is based upon their information and belief that such allegations are true and not upon documentary evidence or sworn statements. See Complaint at 1. Percy and Citizens also contend that the use of the same direct mail fundraising firm by Goland and the Committee mandates that Goland's expenditures are presumptively not independent.

I. Morris Amitay and Michael Goland were not agents or authorized fundraisers of the Committee.

In its regulations at 11 C.F.R. § 109.1(a), the Federal Election Commission ("FEC") defines independent expenditure as:

Mr. Steele  
May 18, 1984  
Page Two

an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.

Percy and Citizens contend that Amitay was an agent of the Committee and that Goland made contributions at the direction of Amitay. The FEC defines agent at 11 C.F.R. §109.1(b) (5) as:

any person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures.

Amitay did not have oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or the candidate, Thomas Corcoran. See Affidavit of Reed J. Wilson ("Wilson Affidavit") at 4. Amitay did not hold any position within the campaign organization. See Wilson Affidavit at 5. Likewise, Goland was not authorized to make expenditures on behalf of the campaign nor did he hold any position within the campaign organization. See Wilson Affidavit at 4-5.

Percy and Citizens further contend that Goland's independent expenditures were "made with the cooperation or with prior consent of, or in consultation with, or at the request of, a candidate or any agent or authorized committee of the candidate" because such expenditures were made through Amitay who was authorized to raise funds for the Committee. See 11 C.F.R. §§ 109.1(a)(4) and 109.1(a)(4)(i)(B). An expenditure is presumed to be made at the direction of the candidate if it is made through an authorized fundraiser. See 11 C.F.R. § 109.1(a)(4)(i)(B). Amitay was never authorized by the Committee to raise funds on its behalf. See Wilson Affidavit at 6. Likewise, Goland was not authorized to raise funds for the Committee. See Wilson Affidavit at 6.

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Mr. Steele  
May 18, 1984  
Page Three

The Committee did not cooperate or consult with Goland nor did it participate in the making of Goland's independent expenditures. See Wilson Affidavit at 7. Also, neither Goland nor Amitay were agents or authorized fundraisers of the Committee. See Wilson Affidavit at 7. The Committee had no involvement in Goland's expenditures and asks the FEC to take no further action against it.

II. The Committee was not aware that Goland used the same direct mail consultant.

Percy and Citizens contend that the use of the same direct mail consultant, AB Data, Ltd. ("AB Data"), by Goland and the Committee gives rise to a presumption that Goland's expenditures were not independent. The Committee was not aware that Goland used the same direct mail consultant. See Wilson Affidavit at 9. As a result of the above-mentioned relationship of the Committee with AB Data and its lack of knowledge that Goland used the same firm, the FEC could not sustain a finding of coordination between Goland and the Committee through AB Data, see MUR 1252/1299, General Counsel's Brief at 39, and, therefore, the Committee asks the FEC to take no further action against it.

III. Conclusion

The Committee respectfully asks the FEC to find that no further action should be taken against the Committee on the basis of the complaint. The Committee's sworn testimony refutes the allegations based on information and belief of Percy and Citizens.

Respectfully submitted,

*William F. Keck*

William F. Keck  
Treasurer  
Corcoran for Senate Committee

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BEFORE THE FEDERAL ELECTION  
COMMISSION OF THE UNITED STATES  
OF AMERICA

IN THE MATTER  
OF CORCORAN FOR  
SENATE COMMITTEE et al.

)  
)  
)

MUR 1684

AFFIDAVIT

COUNTY OF LASALLE  
STATE OF ILLINOIS

)  
) ss:

Reed J. Wilson for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I was the campaign manager for Thomas J. Corcoran and his principal campaign committee, the Corcoran for Senate Committee ("Committee"), in Mr. Corcoran's campaign for the Republican nomination for the office of United States Senator from the State of Illinois.
3. I directed and supervised all aspects of the campaign and was aware of Mr. Corcoran's and the Committee's relationship with campaign employees, agents, fundraisers and consultants.
4. Neither Morris Amitay ("Amitay") nor Michael Goland ("Goland") had oral or written authority, either express or implied, to make or authorize the making of expenditures on behalf of the Committee or Mr. Corcoran.

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5. Neither Amitay nor Goland held any position with the Corcoran campaign organization.

6. Neither Amitay nor Goland were authorized to raise funds for the Committee.

7. Neither Mr. Corcoran, the Committee nor any employees or agents of the Committee cooperated or consulted with Goland in the making of expenditures on behalf of the Committee.

8. AB Data, Ltd. ("AB Data") was retained by the Committee in January, 1983 to perform direct and voter contact mail services. These services included the obtaining of direct mail lists, the creation of fundraising copy and packages, the maintenance of contributor files, the production and mailing of fundraising packages, and the creation and production of voter contact mail to Republican households in selected counties within the state. The Committee did not ask AB Data to provide any services or consultation to the campaign beyond those listed above.

9. The Committee did not know until after the completion and mailing of the Goland direct mail program that Goland also used AB Data as a direct mail consultant.

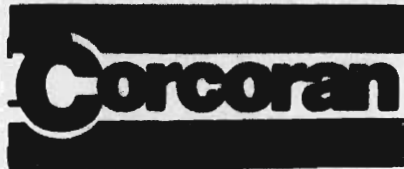
Reed J. Wilson  
Reed J. Wilson

Subscribed and sworn to before me this 18th day of  
May, 1984.

Sharon DeCoursey  
Notary Public Sharon DeCoursey

85040511712

**TOM CORCORAN FOR SENATE COMMITTEE**



POST OFFICE BOX 2867 • AURORA, ILLINOIS 60007

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

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ATTENTION: DUANE BROWN

*mur 1684 Brown*

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STATEMENT OF DESIGNATION OF COUNSEL

84 MAY 17 P 1: 23

G C @ # 3182

MUR 1684

NAME OF COUNSEL: . Steven Nissen / Manatt, Phelps, Rotherberg + Tunney

ADDRESS: 11355 West Olympic Blvd  
Los Angeles, Calif 90064  
(213) 312-4000

TELEPHONE: \_\_\_\_\_

14 MAY 17 P 3: 03

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.

May 14, 1984  
Date

Michael Goland  
Signature

RESPONDENT'S NAME: Michael Goland

ADDRESS: 20221 Prairie St.  
Chatsworth, Calif 91311

HOME PHONE: (818) 349-3661

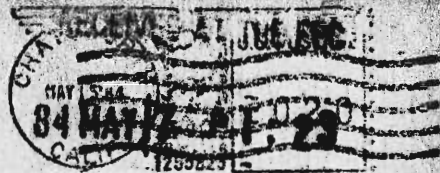
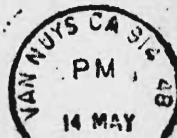
BUSINESS PHONE: \_\_\_\_\_

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EL GOLAND

Prairie Street  
North California

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



REVISED (5-14-84)  
STATEMENT OF DESIGNATION OF COUNSEL

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MURKIN: 00

Brown  
MURKIN 1684

NAME OF COUNSEL: Steve Nessem  
c/o Mann, Phelps, Rottenberg & Tunnay  
11355 W. Olympic Blvd.  
ADDRESS: Los Angeles, Cal 90067  
TELEPHONE: (213) 556-1500

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.

5-14-84  
Date

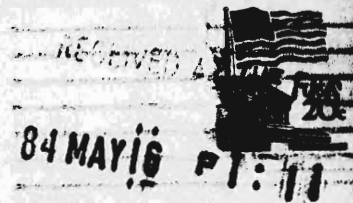
[Signature]  
Signature

NAME: Morris J. Amity  
ADDRESS: Suite 712  
444 N. Capitol St., NW  
Wash DC 20001  
HOME PHONE: (201) 929-1341  
BUSINESS PHONE: (202) 347-6613

85040511716

037403117

MRIS J. AMITAY, TREASURER  
IN POLITICAL ACTION COMMITTEE  
NORTH CAPITOL STREET, N.W.  
SUITE 712  
WASHINGTON, D.C. 20001



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

## STATEMENT OF DESIGNATION OF COUNSEL

84 MAY 7

A8: 05

MUR 1684MUR 1684  
BrownNAME OF COUNSEL: David Ifshin, Esq.ADDRESS: 2201 Wisconsin Ave., N.W.  
Washington, DC 20007TELEPHONE: 625-1780

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.

May 3, 1984  
DateMorris J. Amity  
SignatureRESPONDENT'S NAME: Morris J. AmityADDRESS: Suite 712  
444 N. Capitol St., NW  
Washington, DC 20001HOME PHONE: (301) 929-1341BUSINESS PHONE: (202) 347-6613

85040511718

ATTORNEY AT LAW  
RIS J. AMITAY, P.C.  
TH CAPITOL STREET, N.W.  
SUITE 168  
HINGTON, D.C. 20001



Mr. Kenneth A. Gross  
Associate General Counsel  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 30, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William F. Keck  
Treasurer  
Corcoran for Senate Committee  
P. O. Box 2667  
Aurora, Illinois 60507

Re: MUR 1684

Dear Mr. Keck:

This letter is to notify the Corcoran for Senate Committee and you, as treasurer, that on April 26, 1984, the Federal Election Commission received a complaint alleging that the Committee and you, as treasurer, may have violated sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1684. Please refer to this number in all future correspondence.

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

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

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

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

85040511720

Mr. William F. Keck  
Page 2

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures

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

cc: Tom Corcoran

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85040511722

2001 Apr 11 10:40 AM J 64

• SERVICE: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**CONVULS POSTMASTER PER FIRM**

1. The following service is requested (check one):  
☐ Show to whom and date delivered .....  
☒ Show to whom, date, and address of delivery .....

2. ☐ RESTRICTED DELIVERY .....  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ 6

3. ARTICLE ADDRESSED TO:  
Mr. Wm. F. Reek  
Pres., Corcoran for Sen. Cmte.  
PO Box 6667  
Aurora, Ill 60507

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL

ARTICLE NUMBER 943462

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

DATE OF DELIVERY May 4/84

6. ADDRESSEE'S ADDRESS (only if registered)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

APR 11 1984  
AURORA, ILL

MUR 1684 D.Brown

2001 Apr 11 10:40 AM J 64

• SERVICE: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**CONVULS POSTMASTER PER FIRM**

1. The following service is requested (check one):  
☐ Show to whom and date delivered .....  
☒ Show to whom, date, and address of delivery .....

2. ☐ RESTRICTED DELIVERY .....  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:  
Wm Corcoran  
Rm 2  
Aurora, Ill 61350

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL

ARTICLE NUMBER 943461

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

DATE OF DELIVERY May 4/84 5-48P POSTMARK (only for registered mail)

6. ADDRESSEE'S ADDRESS (only if registered)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1684 D.Brown



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 30, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Morris Amitay  
Washington PAC  
400 N. Capitol Street, N.W. #168  
Washington, D. C. 20001

Re: MUR 1684

Dear Mr. Amitay:

This letter is to notify you that on April 26, 1984, the Federal Election Commission received a complaint alleging that you may have violated sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1684. Please refer to this number in all future correspondence.

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

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

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

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

85040511723

Mr. Morris Amitay  
Page 2

If you have any questions, please contact Duane Brown,  
the attorney assigned to this matter at (202) 523-4000. For  
your information, we have attached a brief description of  
the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gress  
Associate General Counsel

Enclosures

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

85040511724

|  |                          |
|--|--------------------------|
| 1. The following service is requested (check one):<br><input type="checkbox"/> Return to sender and date delivered<br><input type="checkbox"/> Return to sender, date, and address of delivery |                          |
| 2. <input type="checkbox"/> RESTRICTED DELIVERY<br>(The restricted delivery fee is charged in addition to the other receipt fee.)  |                          |
| TOTAL \$   |                          |
| 3. ARTICLE ADDRESSING TO:<br>MR. MORRIS AMITAY<br>WASH. DC<br>400 N. CAPITAL ST. NW # 168<br>WASH. DC 20001  |                          |
| 4. TYPE OF SERVICE:<br><input type="checkbox"/> REGISTERED<br><input type="checkbox"/> CERTIFIED<br><input type="checkbox"/> EXPRESS MAIL  | ARTICLE NUMBER<br>943463 |
| I have received the article described above:<br>SIGNATURE <input type="checkbox"/> ADDRESS <input type="checkbox"/> RETURNED TO SENDER   |                          |
| DATE OF DELIVERY<br>5 3 84   |                          |
| 5. ADDRESSEE'S ADDRESS (only if changed)   |                          |
| 7. UNABLE TO DELIVER BECAUSE:  |                          |

MAIL 1684 D. Brown



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 30, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Michael Goland  
20221 Prarie Street  
Chatsworth, CA 91311

Re: MUR 1684

Dear Mr. Goland:

This letter is to notify you that on April 26, 1984, the Federal Election Commission received a complaint alleging that you may have violated sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1684. Please refer to this number in all future correspondence.

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

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

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

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

85040511725

Mr. Michael Goland  
Page 2

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosures

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

85040511726

|  |  |                                       |  |
|--|--|---------------------------------------|--|
| 1. THE FOLLOWING SERVICE IS REQUESTED (check one):<br><input checked="" type="checkbox"/> Return to sender and date delivered<br><input type="checkbox"/> Return to sender, date, and address of delivery<br><input type="checkbox"/> RETURNED DELIVERY (the addressee delivery fee is charged in addition to the return postage fee.) |  | TOTAL \$                              |  |
| 2. ADDRESSEE'S NAME AND ADDRESS IN THE "RETURN TO" SPACE ON FRONT:<br><i>Michael Goland<br/>20221 Prairie St<br/>Chattworth, CA 91311</i>  |  |                                       |  |
| 3. TYPE OF SERVICE:<br><input type="checkbox"/> Registered<br><input type="checkbox"/> Insured<br><input type="checkbox"/> Registered and Insured  |  | ARTICLE NUMBER<br><i>943464</i>       |  |
| I have received the article described above.<br>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Registered agent<br><i>Duane Brown</i>   |  |                                       |  |
| 4. DATE OF DELIVERY<br><i>5/17/84</i>  |  | POSTAGE<br>PAID BY ADDRESSEE ONLY     |  |
| 5. ADDRESSEE'S ADDRESS (if it differs from the one on the front)<br><i>20221 PRAIRIE</i>   |  | 6. EMPLOYEE'S NAME<br><i>D. Brown</i> |  |
| 7. UNABLE TO DELIVER BECAUSE:<br><i>Mar 1684</i>   |  |                                       |  |



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1984

Daniel J. Swillinger, Esquire  
DAVIS & GOOCH  
920 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

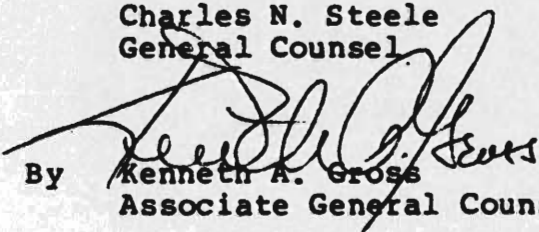
Dear Mr. Swillinger:

This letter is to acknowledge receipt of the complaint of your clients, Senator Charles H. Percy and Citizens for Percy '84, which we received on April 26, 1984, against Michael Goland, Morris Amitay, William F. Keck and Corcoran for Senate Committee which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By   
Kenneth A. Gross  
Associate General Counsel

Enclosure

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DUPLICATE 1684 BEOWN

• **GENERAL INSTRUCTIONS:** Fill in 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

**POSTAGE POSTMASTER PERmits**

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

☐ None to whom and date delivered \_\_\_\_\_

☐ None to whom, date, and address of delivery \_\_\_\_\_

2. ☐ **REGISTERED MAIL** (For registered delivery fee is charged in addition to the above except fee.)

**TOTAL \$** \_\_\_\_\_

3. **ARTICLE ADDRESS TO:** Daniel J. Sundblom  
David G. Gooch  
900 P.A. Ave. S.E.  
Washington DC 20003

4. **TYPE OF SERVICE:** ☐ Registered ☐ Insured ☐ Collect ☐ Cash on delivery

**ARTICLE NUMBER** 943458

(Always obtain signature of addressee or agent)

I have received the article described above.

☐ Registered ☐ Insured ☐ Registered agent

**SIGNATURE** *Patricia Sundblom*

**DATE OF DELIVERY** 5/3/84

**ADDRESSEE'S ADDRESS (only if registered)**

7. **UNABLE TO DELIVER BECAUSE:**

8. **EMPLOYEE'S INITIALS**

• **U.S. MAIL**

60-2269

LAW OFFICES OF  
**DAVIS AND GOOCH**

920 PENNSYLVANIA AVENUE, S.E.  
WASHINGTON, D.C. 20003  
(202) 540-3600

WILLIAM E. DAVIS •  
RAYMOND L. GOOCH •

• ALSO ADMITS NORTH CAROLINA BAR  
• ALSO ADMITS VIRGINIA BAR

DANIEL J. WILLINGER  
OF COUNSEL

APR 26 9:13

April 25, 1984

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

Dear Mr. Steele:

This Complaint is being filed on behalf of Senator Charles H. Percy and Citizens for Percy '84, his principal campaign committee for the 1984 primary and general elections.

The following statements and representations are made upon information and belief.

INTRODUCTION

A Los Angeles businessman, Mr. Michael Goland, financed a substantial radio, television and direct mail campaign against Sen. Percy prior to the March 20, 1984 Illinois Republican Senatorial primary. Mr. Goland has reported these expenditures to the Commission as independent expenditures, which, under the Act and regulations, are not subject to contribution limitations. By reporting these expenditures as independent, he is stating that they were not made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of the candidate." 11 CFR §109.1(a).

In fact, as the following discussion and accompanying documentation demonstrates, these expenditures were made in coordination and consultation with the campaign of Rep. Thomas Corcoran, Sen. Percy's principal primary opponent.

This constitutes a major violation of the Act. Since the expenditures are not independent, they are contributions well in excess of the \$1000 per election limitation. The Act provides that in the case of a violation of the contribution limitations, the Commission may impose a fine equal to the illegal contribution; in this case, that means at least \$278,729.

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### THE VIOLATIONS

As reported in the enclosed story from the March 8, 1984 Chicago Tribune (EXHIBIT 1), Mr. Goland is a California real estate investor. The Tribune article states that he has purchased over \$100,000 worth of radio and television time in Illinois attacking Sen. Percy. Mr. Goland's FEC filing puts the amount at \$152,090. (EXHIBITS 4 & 4a) Attached are transcripts of the advertisements he ran. In a radio ad Mr. Goland urges voters "to make a change in Illinois" and send a different person to the Senate (EXHIBIT 2); in a television spot (EXHIBIT 3) he states that the U.S. Senate is no place for someone with a voting record like Sen. Percy's.

In addition, Mr. Goland has funded a \$127,000 anti-Percy direct mail campaign. (See Sec. B).

All of these expenditures clearly advocate Sen. Percy's defeat.

#### A. The Amitay Connection

In Part 109 of the Commission's regulations, an "independent expenditure" is defined as an expenditure designed to influence an election which is not made:

with the cooperation or with the prior consent of,  
or in consultation with, or at the request or sugges-  
tion of, a candidate or any agent or any authorized  
committee of the candidate.

11 CFR §109.1(a).

The Commission's regulations go on to state that the Commission will presume that an expenditure is not independent when it is made through a person authorized to raise funds for a candidate, 11 CFR §109.1(b) (4) (i) (B), or by someone who was told of the campaign's "plans, projects or needs." 11 CFR §109.1(b) (4) (i) (B).

Mr. Goland made these expenditures at the direction of Mr. Morris Amitay, an individual who was both an agent of and fundraiser for the Corcoran campaign. Mr. Amitay was closely involved with the Corcoran campaign and most certainly aware of the campaign's plans, projects and needs. Consequently, further investigation will most likely show that Mr. Goland's expenditures were made with the knowledge of these plans and needs. These are two bases upon which the Commission can find that Mr. Goland's expenditures were not independent.

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Mr. Amitay's relationship to the Corcoran campaign is amply documented. One of the very first fundraising letters sent out by the Corcoran campaign (EXHIBIT 5), contained an interview of Rep. Corcoran by Mr. Amitay. Furthermore, the February 13, 1984 issue of the Baron Report (EXHIBIT 6), a highly respected newsletter on politics, states that Mr. Amitay "is raising funds for and advising Corcoran." This is confirmed by a story in the March 3, 1984 Wall Street Journal (EXHIBIT 7). Clearly, Mr. Amitay is intimately connected with the Corcoran campaign.

(He has indicated that he intends to support Rep. Paul Simon in the general election, his sole objective being to defeat Sen. Percy.)

The relationship between Mr. Goland and Mr. Amitay is also well documented. Mr. Goland is a Board member of the Washington Political Action Committee; Mr. Amitay is the Committee's Treasurer. The two have thus had frequent opportunities to converse about the primary campaign. FEC reports show that Washington PAC has contributed to the Corcoran campaign on two occasions, once in 1983 and again this year.

However, it is not necessary to infer coordination or control between Mr. Amitay and Mr. Goland from the fact that they have had an opportunity to discuss the Percy/Corcoran race. Mr. Amitay has himself said that he controls Mr. Goland's political expenditures. In a February 24, 1984 letter to a Washington political fundraiser, Mr. Amitay stated that Mr. Goland did not "make a move without my o.k." (EXHIBIT 8). This is a clear admission that Mr. Goland's expenditures were at Mr. Amitay's direction. It conclusively shows that the expenditures by Mr. Goland have not been made independently of the Corcoran campaign.

#### B. The AB Data Connection

Mr. Goland also financed an anti-Percy letter (EXHIBIT 9) on behalf of Rep. Corcoran. This 90,000 person mailing was produced by AB Data, Ltd. of Milwaukee at a cost of \$27,639.60, according to Mr. Goland's FEC filing (EXHIBIT 10). He paid an additional \$100,000 for anti-Percy direct mail to an Arlington, Virginia firm (EXHIBIT 10a), which we believe to be part of the same coordinated effort.

AB Data is also the direct mail fundraising firm used by Rep. Corcoran, as evidenced by his FEC reports (EXHIBIT 11), which show the campaign paid AB Data nearly \$220,000 in 1983 and 1984, and still owes \$40,000 to AB Data. Jerry Benjamin, a direct mail consultant, is a principal of AB Data, and was a consultant to the Corcoran campaign. (EXHIBIT 12).

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Charles N. Steele, Esquire  
April 25, 1984  
Page Four

Clearly, Mr. Goland was coordinating his direct mail efforts with those of Rep. Corcoran. It was no coincidence that, out of the hundreds of direct mail fundraising firms in the country, Mr. Goland picked the very same one which was servicing Rep. Corcoran.

Commission regulations, 11 CFR § 109.1(b)(4) and (5), and past enforcement matters (i.e. MUR 1424, Caputo, Finkelstein, NCPAC) hold that when a campaign and a person making expenditures on behalf of that campaign use the same fundraising agent, the expenditures are presumptively not independent. Mr. Goland's mailing was designed to assist the Corcoran campaign. Its content and timing were designed by Rep. Corcoran's direct mail consultant to provide the maximum benefit to the Corcoran campaign.

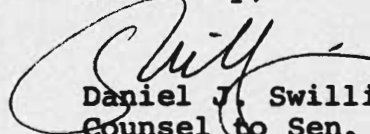
#### CONCLUSION

Expenditures which do not qualify as independent are treated as contributions to the candidate who benefitted from the expenditures. In Mr. Goland's case, this means he contributed more than 278 times the \$1000 legal limit to the Corcoran campaign. (According to FEC records, this is nearly 13 times more than anyone spent supporting or opposing Congressional candidates in 1982.)

The information provided herein is strong and direct evidence that Mr. Goland's expenditures were not permissible, and provides the Commission with an abundance of data more than sufficient to require the Commission to undertake an investigation of Mr. Goland's illegal contributions, and his intimate relationship with the Corcoran campaign and its agents.

Thank you for your prompt attention.

Sincerely,



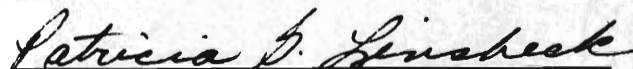
Daniel J. Swillinger  
Counsel to Sen. Percy and  
Citizens for Percy '84

Attachment - EXHIBITS

Washington  
District of Columbia: SS

SUBSCRIBED and SWORN TO before me this 25<sup>th</sup> day of April, 1984.

My Commission Expires January 1, 1987

  
Notary Public, D.C.

85040511732

EXHIBITS

1. Chicago Tribune, March 9, 1984
2. Radio ad transcript
3. TV ad transcript
4. Goland telegrams reporting radio and TV expenditures
5. "CAN YOU NAME..." Corcoran fundraising letter
6. Baron Report, February 13, 1984 pp 3 and 4
7. Wall St. Journal, March 8, 1984
8. Amitay letter, February 24, 1984
9. Anti-Percy mailing, paid for by Goland
10. Goland telegrams reporting direct mail expenditures and Knabe letter.
11. Corcoran report
12. Daily Herald, July 7, 1983

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# Californian assails Percy in TV ads

By David Axelrod  
and Howard Witt

A WEALTHY California real estate developer prominent in Los Angeles Jewish circles has purchased more than \$100,000 worth of Illinois radio and television time for ads that attack Sen. Charles Percy (R., Ill.) as a "two-faced senator" who should be unseated.

The ads are to begin running Friday on WGN-TV (Channel 9), WGN-AM and at least eight Downstate radio and television stations, said a spokesman for the Chicago firm hired to produce them. The three network-owned stations in Chicago have declined to run the ads, the spokesman said.

The 30-second radio spot and 30-second TV ad feature the voices of a man and a woman alternately criticizing Percy for changing his position "every time the wind blows."

Michael Goland, the Californian who purchased the ads, said through a spokesman Thursday that he is not running the ads on behalf of any particular candidate. The radio ad, played for a reporter Thursday, closes with the statement: "Not authorized by any candidate or candidate's committee."

BUT KATHY LYDON, a Percy spokesman, charged that attorneys for the Percy campaign "have been given information that raises questions about the possible connection between this independent expenditure and our primary opponent."

Don Philmore, a spokesman for U.S. Rep. Thomas Corcoran, Percy's major opponent in the March 20 Republican primary, replied, "We have nothing to do with these ads."

Goland, who says he has business interests in Chicago as well as California, declined to be interviewed about his reasons for buying the ads, said Margaret Navolio, a vice president of the Avelly, Scott & Madison advertising firm in Chicago, which was hired by Goland to produce the spots.

He did, however, release several comments through Navolio. "I have not made up my mind as to whom to support yet in the general election," Goland said in the



Ads criticize Sen. Charles Percy for changing his position "every time the wind blows."

statement. "But I do know that I am opposed to Sen. Percy's re-election because of his lack of consistent, effective representation in the Senate on a large number of issues."

NAVOLIO SAID Goland resented being asked whether his religious affiliation had motivated him. Percy, chairman of the Senate Foreign Relations Committee, is viewed by some U.S. Jewish leaders as being insufficiently sympathetic to Israel.

The ads make no mention of Percy's Mideast stands. They charge that he announced he was for an all-volunteer Army but voted for draft registration; claimed to be against the dumping of nuclear wastes but voted to deny states the right to veto sites; and vowed to oppose cuts in education funding but voted to reduce school nutrition programs and training for the handicapped.

Lydon denied each charge. Percy never voted for draft registration, she said; it was imposed by President Jimmy Carter. Percy has supported a combined state and federal approach to nuclear waste disposal, she said, and he has consistently voted for increased education budgets.

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Michael Goland :60 Radio Commercial -- "Two-Faced"

ANNCR: What would you say about someone who says one thing and does another? What would you think about a man who changed his position every time the wind blows? What do you call a politician who promises to stand up for you and then takes the other side?

In Illinois we call him Senator Percy. When he went to the Senate he said he was for an all-volunteer Army. But Percy voted for compulsory draft registration. Charles Percy said he was for states rights and against the dumping of nuclear waste. But he voted to deny states their right to veto nuclear dump sites within their borders.

Percy said he would never allow cuts in the funding of our children's education. But Percy voted against maintaining school funding, against education and training for the handicapped, and against school nutrition programs.

In this election year with so much at stake let's make a change in Illinois and send one face to the Senate, not two. The two-faced Senator is a real disadvantage.

Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

85040511735



EXHIBIT 3

Kelly, Scott and Madison, Inc.  
One East Wacker Drive, Suite 3320  
Chicago, Illinois 60601  
312 826-8880

TITLE: "COLORS" (POLITICAL ADVOCACY)  
COPY: 30 SECOND TELEVISION  
CLIENT: MICHAEL GOLAND; INDEPENDENT EXPENDITURE

COLORS

OPEN ON: GREY LIMBO SETTING (TABLE TOP WITH SWEEP)  
FROM LEFT CORNER, SMALL CHAMELEON CRAWLS TO CENTER STAGE

V.O.

IN ALL THE YEARS CHARLES PERCY  
HAS BEEN IN THE SENATE, IT'S BEEN  
HARD TO KNOW HIS TRUE COLORS

BY THE END OF THE ABOVE, THE CHAMELEON IS CENTER STAGE AS CAMERA TRUCKS  
IN, THE CHAMELEON BEGINS TO TURN A SHADE OF RED

V.O.

WHEN WE SENT PERCY TO THE U.S. SENATE  
HE SAID HE WAS FOR AN ALL-VOLUNTEER ARMY

CHAMELEON TURNS TO A SHADE OF YELLOW

V.O.

BUT IN 1980 PERCY VOTED FOR  
COMPULSORY REGISTRATION FOR  
THE DRAFT

CHAMELEON TURNS TO GREEN AS CAMERA PANS THE LENGTH OF ITS BODY

V.O.

PERCY SAID HE WAS AGAINST THE DUMPING  
OF NUCLEAR WASTE AND FOR THE RIGHT OF  
STATES TO CONTROL IT

PAN ACROSS OTHER SIDE OF CHAMELEON AS IT TURNS TO BLUE

85040511736

V.O.

THEN HE VOTED TO DENY STATES  
THE RIGHT TO SITE NUCLEAR DUMP  
SITES WITHIN THEIR OWN BORDERS

CAMERA TRACKS IN ON CHAMELEON'S HEAD AND EYES AS IT TURNS ORANGE

V.O.

IN MARCH OF 83 PERCY SAID HE WAS  
OPPOSED TO CUTBACKS IN FUNDING FOR  
EDUCATION

CHAMELEON TURNS PURPLE AS TABLE IS ROTATED SO THAT CHAMELEON APPEARS TO  
TURN.

V.O.

BUT PERCY VOTED AGAINST MAINTAINING  
FUNDING FOR OUR SCHOOLS, AGAINST  
EDUCATION FOR THE HANDICAPPED AND  
TO DENY MONEY FOR NEEDED SCHOOL  
LUNCH PROGRAMS

CAMERA PULLS BACK AS LIZARD IS SEEN FROM A STRAIGHT-ON POSITION

V.O.

PERCY SAID HE WOULD NEVER VOTE  
FOR A RED INK BUDGET

CHAMELEON CHANGES COLOR AGAIN

V.O.

THEN VOTED FOR THE LARGEST DEFICIT  
IN HISTORY...AND FOR A RAISE IN  
HIS SENATE PAY

PULL BACK SLOWLY AS CHAMELEON CHANGES COLOR MORE RAPIDLY

V.O.

IN TWENTY YEARS WE HAVEN'T LEARNED  
PERCY'S TRUE COLORS. BUT WE HAVE  
LEARNED THAT THE U.S. SENATE IS NO  
PLACE FOR A CHAMELEON

85040511737

8183443661 TDRN CHATSWORTH CA 44 03-19  
0157P EST 13:57 T

EXHIBIT 4

Western Union

Telegram

1964 MAR 16 PM 4:52

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTHEAST  
WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY. TO ACHIEVE THIS I  
PAID \$16,700 TO KELLY, SCOTT, AND MADISON, 1 EAST WACKER DRIVE,  
CHICAGO, ILLINOIS 60601.

CC: ILLINOIS STATE BOARD OF ELECTION  
MICHAEL GOLAND  
20221 PRAIRE ST  
CHATSWORTH CA 91311

13:57 EST

IPMPOMX WSH

85084527073825916

0257P EST 14157 IPMPOMX WSH

EXHIBIT 4a

Telegram

SECRETARY OF SENATE RPT DLY MGM, DLR  
119 D ST NORTH EAST  
WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR RADIO AND TELEVISION ADS FOR  
THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY, TO ACHIEVE THIS  
PAID \$135,390.00 TO KELLY, SCOTT, AND MADISON 1 EAST WACKER DRIVE  
CHICAGO ILLINOIS 60601  
MICHAEL GOLAND  
20221 PRARIE ST  
CHATSWORTH CA 91311

14157 EST

IPMPOMX WSH

8 5 0 8 4 0 0 5 2 1 9 1 0 7 6 3 9 1 8

RECEIVED  
JUN 15 1964  
FBI - CHICAGO

EXHIBIT 5

CAN YOU NAME  
ISRAEL'S  
WORST ADVERSARY  
IN CONGRESS?



@ Pacy

85040511740

FIRST CLASS POSTAGE WILL HELP



NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**BUSINESS REPLY MAIL**

FIRST CLASS PERMIT NO. 40 AURORA, IL

POSTAGE WILL BE PAID BY ADDRESSEE

attn: Lou Morgan

**Corcoran Committee**

P.O. Box 2667

Aurora, IL 60507



# ● We can defeat Charles Percy!

CA38  
MR. ARTHUR RUBLOFF  
1040 N. LAKE SHORE DR.  
CHICAGO, IL 60611

AZZ

Please correct my address to:

Although we try to eliminate duplication, it is not always possible to prevent your receiving more than one letter. If you receive an extra copy, please pass it along.

● You, you can count me in!  
Enclosed is my check for:  
☐ \$1000 ☐ \$500 ☐ \$250 ☐ \$100 ☐ 550  
☐ \$25 ☐ Other \$ \_\_\_\_\_  
Please make checks payable to: The Corcoran Committee  
P. O. Box 2667  
Aurora, IL 60507

To help us comply with F.E.C. filing requirements,  
please provide all the following information:

☐ Mr. ☐ Mrs. ☐ Ms. ☐ Mr. & Mrs. ☐ \_\_\_\_\_

NAME Last First

HOME TELEPHONE

OCCUPATION TITLE

FIRM/ORGANIZATION ☐ SELF-EMPLOYED

## Morrie Amitay talks with Tom Corcoran

AMITAY:

Tom, U.S.-Israel relations has become a pivotal issue in the Illinois Republican Primary. Why is that?

CORCORAN:

U.S.-Israel relations is presently a hot topic of conversation all over the country, including Illinois. Because Percy has such a negative voting record on this issue and mine is just about the opposite, the public has naturally picked up on it. It defines a clear difference in our political philosophies.

AMITAY:

I know you have only a small number of Jewish voters in your district and that you are not Jewish. Why, then, are you a supporter of Israel?

CORCORAN:

Symbolically, I believe in Israel for many of the same reasons I believe in America. The people of Israel, by the depth of their hard work and high intelligence, created a modern, stable and democratic society from virtually nothing — much like the authors of our Constitution. When I first visited Israel, I knew immediately that I was in a free and vibrant country.

AMITAY:

Can you be a little more concrete?

CORCORAN:

Sure. Israel is an ally. She is an invaluable friend of the United States. And, I am convinced that the national security of our country requires a strong and secure Israel. If we had a few more allies of Israel's quality, we — and the world — would be a lot better off.

AMITAY:

I take it your stance on Israel is not your main reason for entering the primary. Is it?

CORCORAN:

No. Simply, I will run against Percy because I believe I can do a more credible job of representing all the citizens of Illinois.



Tom Corcoran (left) discusses U.S.-Israel relations with Morrie Amitay (right).

IMPORTANT  
FINANCIAL  
INFORMATION  
ON BACK

Mr. Amitay is the former Executive Director of the American Israel Public Affairs Committee (AIPAC). Presently, he is a practicing attorney in Washington, DC, and a nationally syndicated columnist.

# IMPORTANT FEDERAL ELECTION REQUIREMENTS

Individuals may contribute up to \$1,000 to the primary and \$2,000 to the general election. A husband and wife may each contribute up to the \$1,000 limit for each election. Each child under 18 may voluntarily decide to contribute up to \$1,000 towards each election from their own funds.

Partnerships may make contributions up to the aggregate individual limits of each partner. All partnership checks must either clearly indicate the partners to whom the contribution is to be credited and the amounts to be credited to each, or must be accompanied by a partnership breakdown by percentages and the contribution will be allocated in accordance with these percentages.

Corporations, Proprietorships and Unions cannot contribute to the committee except through corporate or union PACS.

Corporate, Union or Other Political Action Committees (PACS) filed with the Federal Election Commission may make contributions of up to \$5,000 to the primary and \$5,000 to the general election.

Your contribution is eligible for a federal income tax credit in the amount of one-half of the contribution. The maximum credit that can be claimed in one year is \$50 per individual or \$100 for married couples filing joint returns.

Your help in providing the names and addresses of friends and associates who would be interested in contributing would be greatly appreciated. Please enclose a list of these individuals with your reply card.

Paid for by The Corcoran for Senate Committee,  
Donald M. Cassidy, Jr., Treasurer

## Tom Corcoran

### Highlights from the record of a good friend

- Wrote a letter to President Reagan, urging him to lift the suspension of delivery of the F-16 aircraft to Israel (6/81).
- Voted to disapprove the sale of AWACS and offensive enhancement equipment for the F-15's to Saudi Arabia (10/81).
- Co-sponsored a concurrent resolution calling upon the Union of Soviet Socialist Republics to end the current policies of Jewish emigration discrimination and anti-Semitism (11/81).
- Voted for \$2.2 billion in military and economic assistance for Israel (12/81).
- Wrote a letter to General Jaruzelski, expressing concern over recent reports of officially sanctioned anti-Semitic statements made in the Polish media (2/82).
- Co-sponsored a concurrent resolution commending the State of Israel for its compliance with the Camp David accords (7/82).
- Wrote a letter to President Reagan, expressing opposition to the sale of advanced military weapons to Jordan unless King Hussein agrees to join the peace process. (Corcoran was the original signatory and key Republican spearheading the letter. It was sent with 182 signatures. 12/82)
- Wrote a letter to President Reagan, urging an end to the delay of the sale of F-16 aircraft to Israel (3/83).
- Recently brought out two "refuseniks" from the Soviet Union and continues to work tenaciously for the cause of Soviet Jewry.

"Tom Corcoran believes in America  
and her commitment to Israel."

ILLINOIS SENATE PRIMARIES

In most Senate races this year, both parties' nominations are uncontested. In most of the exceptions, primary battles will be waged for the privilege of losing, or will not involve factors of national significance.

But a few primaries will be significant in measuring the impact of particular issues, ideological factions, constituencies, party organizations and campaign strategies and tactics. The first of these is in Illinois.

Republicans Since his close call last time, there's been no question that Sen. Charles Percy would face a primary challenge from the right. Percy worked to appease the opposition. Between 1977 and 1982, his ACA (conservative) Senate voting record rating skyrocketed from 10 to 56% and his Chamber of Commerce rating moved from 53 to 65%. Percy's ADA (liberal) rating fell from 65 to 45% and his rating from the AFL-CIO (which endorsed him last time), from 47 to 28%. Percy won the support of President Reagan, plus the vast majority of his state's GOP party and public officials. He has campaigned vigorously for months, and raised record funds. An early February statewide poll for WLS-TV puts him ahead of his New Right primary challenger, Rep. Tom Corcoran, 65-17%. Only 46% of the respondents could identify Corcoran and only 16% had an opinion of him.

Percy appears less vulnerable than other recent rightwing primary targets for two other reasons. First, the Illinois Republican party is much more non-ideological and moderate than many others. Second, charges that Percy is disloyal to Reagan could backfire: traditionally in American politics, even a President's partisans do not want their Senators to be "rubber stamps."

Nevertheless, Percy is not safe. He remains an anathema to rightwing activists, who are infuriated by liberal moves (such as meetings with Jesse Jackson); assert his changing voting record is a fraud and reflects lack of character; find him personally "pompous" and stereotypical of establishment elitists. One cannot underestimate the impact of such activists in a low turnout; nor should one overestimate how much the GOP organization can deliver for Percy. Most of its leaders back him because he's the incumbent and is more electable in November, rather than out of conviction.

Corcoran is bright and aggressive; he's been campaigning for over a year. Polls this early are highly unreliable in primaries, since few voters have focused on the race, so an upset remains possible.

One other factor: leaders of the pro-Israeli lobby view Percy as an arch-enemy. Morrie Amitay, a former aide to liberal Sen. Ribicoff (D-CT) and ex-director of the American Israel Public Affairs Committee, is raising funds for and advising Corcoran. Response has been less than hoped for; indeed, there's been somewhat of a pro-Percy "backlash" among moderate Jews offended by the nature of the anti-Percy appeals as well as Corcoran's ideology. (Amitay contends he'll switch to Rep. Paul Simon, the Democratic frontrunner, in November, even if Corcoran upsets Percy.)

Democrats Rep. Paul Simon, the strong frontrunner, hesitated before entering the race. As a newspaper publisher, state legislator and Lt. Governor from southern Illinois, Simon built a record as a progressive, "good government," reformer. He ran for the 1972 Gubernatorial nomination, with the endorsement of the party organization, including Chicago's Mayor Daley. But ironically, Simon was labeled the machine candidate and lost to maverick Dan Walker. In 1974 he was elected to the House, where he has become a leader on education and labor issues. Despite a narrow race in 1980 (after backing Kennedy against Carter in his conservative district and facing a GOP opponent named John Anderson), Simon's House seat is secure. But national Democratic, liberal, labor and Jewish leaders convinced him to take on Percy.

State party leaders found Simon fully acceptable, but top ones would not

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reject a bid for support from Phil Rock, the aggressive State Senate President and party leader. Rock's power has helped him recruit not only organization Democrats, but Hispanics, unions (like AFSCME) and others he's helped in Springfield. (The AFL-CIO split 47 Simon, 12 Rock, 1 Burris and 39 for no endorsement, which prevailed, since a 2/3 vote was needed for one.) Rock is backed by the white faction of the Chicago party, led by Alderman Eddie Vrdolyak. (But most downstate county chairs back Simon.)

Chicago Mayor Harold Washington is not active in the race. Indications are that he personally prefers Simon. But, he expresses loyalty to the organization. And the third candidate, black State Controller Roland Burris, makes it impossible for him to move in any direction. For Washington, that may be complicated, but it's certainly convenient. Mathematically, Burris, a banker and moderate, could conceivably win a plurality in the four way race, if blacks bloc vote. But there's little liklihood of that: Burris is having money problems, poll results are discouraging, and he may even drop out.

The fourth contender is Alex Seith, a Chicago Ivy League attorney who served as the Daley machine's spokesman in Party reform battles. Seith scared Percy in 1978, but lost the 1980 primary to Sen. Dixon, drawing 19% of the vote. Seith's already spent some \$500,000 of family money (primarily) on Chicago TV. And it's had an impact, as the following polls indicate.

The February WLS-TV survey reported Simon 31%, Seith 20%, Burris 9%, Rock 9%. A late January poll by WBBM-TV reported Simon 34%, Seith 14%, Burris 12%, Rock 9%. (In Chicago, the figures were, respectively, 26%, 15%, 14%, 13%.)

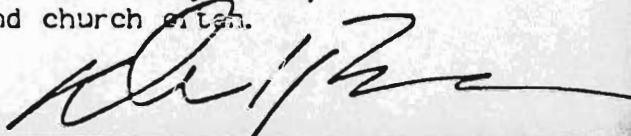
#### GETTING GOD INTO POLITICS

President Reagan is seeking to make prayer in public schools a major campaign issue, after ignoring it since the last campaign. "Voluntary" prayer is favored by about 75% in polls; that's a strong consensus, even though it's less than the level of support for sex education. (Parents are pragmatic.) And Democrats are, for the most part, terrified of taking Reagan on on it.

If they did, they might be surprised at the public's good judgement. In the polls, the main reason given for favoring school prayer is that people have the right to pray anywhere they want. What RR proposes is not "voluntary," but "non-compulsory" prayer. When such prayer was allowed, the few school children with the courage to opt out were generally told to wait in the hall or the principal's office. Finally, the only two possible sources for classroom prayers -those of particular religious groups and those drafted by government agencies - each would meet with strong opposition.

That's why rightwing Sen. Orrin Hatch (R-UT), among others, advocates legislation allowing a "moment of silence" in classes. That concept has drawn support from such respected liberals as Rep. Barney Frank (D-MA), provided, obviously, there's no instruction to silently pray. But Reagan's rejected that alternative, as it would cost him his "they've taken God out of the schools" rhetoric. One question he does not address: if he believes the Supreme Court has the ability to remove God from the schools, does he also believe the Supreme Soviet has succeeded in removing God from Russia?

Human Events, the "house organ" of New Right Republicans, has opened the 1984 political/religious campaign on other fronts. Its most recent issue includes attacks on the National Council of Churches and Islamic leaders, and Reagan's address to the Religious Broadcasters, which, he concluded with Christian prayers. The issue also exposed Walter Mondale's brother, a retired Minister nearing eighty. Lester Mondale, it seems, is a "Humanist" and "Humanists" favor sex education and the nuclear freeze. The article admits that Walter is Presbyterian, not "Humanist", but it reports that he does not attend church often.



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## **Humbling Fight** Despite His Prestige, Sen. Percy Runs Scared In the Illinois Primary

**Foreign Affairs Panel Chief  
Is the Only GOP Senator  
Facing Such a Challenge**

### **Ill Luck of Two Predecessors**

By **DAVID FARMER**

Staff Reporter of The Wall Street Journal  
**DECATUR, Ill.**—"I just love these town hall meetings!"

Speeding across the month-long Illinois primary, Sen. Charles Percy, the cautious boy wonder of Illinois Republican politics, was putting a convincing case on a dubious argument. Half a world away, in Moscow, dignitaries from many nations were assembling to bury Yuri Andropov. But to hear the chairman of the Senate Foreign Relations Committee tell it, the progeny of Red Square didn't hold a candle to the Ed-Regan-Bush Western, which he had just left, or the December Holiday Inn, to which he was heading.

"Not for me. I wouldn't want to be there," Sen. Percy confided in his rich senatorial baritone. "With my schedule this week—you've seen my schedule—can you see me canceling out to be in Moscow? I would have been miserable over there."

Maybe. Trouble is, Sen. Percy, who didn't press hard to go to Moscow, can hardly be ecstatic over here. For the senator, who has long been dogged by a reputation for pomposity and by grumbling that he is more at home on the streets of Paris, France, than Paris, Ill., is running scared. Again.

The senator survived a harrowing 1978 Democratic challenge, mostly because of his opponent's mistakes and his own show of humility. "I've got the message," he assured voters then. Now, he is being tested within his own party, in the March 20 Illinois primary. He is the only GOP senator to face a primary challenge. Most Illinois Republican officials predict that he will survive: a recent Chicago Sun-Times/Channel 5 News poll showed him leading by 71% to 27%. But even if he does survive, Sen. Percy will go into a difficult fall campaign in weakened political condition. Four Democrats are vying to take him on.

So, once again, Illinois voters are witnessing the spectacle of a man who has always eyed the distant horizons—only to keep bumping into the here-and-now. It is an object lesson in how the uncertainties of political life can humble the proudest ego, thwart the grandest dream.



Sen. Charles Percy

Chuck Percy is the stereotypical man in a hurry. At age 28, he was named to head Bell & Howell—the youngest chief executive of a major corporation in the nation. Elected to the Senate at 47, he was immediately portrayed as presidential timber, the hope of the "Rockefeller wing" of the GOP. He did little to discourage such perceptions. And in the midst of Watergate, which provided an upheaval in Republican presidential politics, he began actively exploring a 1976 presidential run.

But then they died after Gerald Ford took hold of the White House. In subsequent, that time marked the high tide of the Percy career. Today, at 61, the blond hair has gone to gray, the GOP's "Rockefeller wing" has crumbled, and Charles Percy must run very hard just to stay where he is.

"Chuck Percy will be defeated in 1984," asserts his only serious primary opponent, Tom Corcoran, a conservative turn-of-mind congressman who likes to joke that, if elected, he would be the first senator from Notre Dame. "It's just a question of whether he is defeated in the primary or the general," Rep. Corcoran says, adding:

"In the past, he has always taken Republicans for granted, then reached out for labor, blacks and Jewish voters. But this year, labor wants a Democratic Senate, blacks are going to vote a straight Democratic ticket and Jewish voters are upset over his attitude toward Israel. Chuck's coalition has fallen apart. Time has caught up with him."

Rep. Corcoran, who talks of spending up to \$1.4 million in his primary-election effort.



Hart draws spotlight in Georgia's Democratic primary. (Page 62)

has assembled an odd coalition of his own: hard-line conservatives of the New Right, liberal-leaning Jewish contributors and a scattering of grass-roots GOP workers. The New Right activists helped persuade him to run and lent him campaign start-up money. Some Jewish contributors, out to punish Sen. Percy, are pumping contributions into the Corcoran campaign. But if he does pull it off, the disgruntled grass-roots workers will probably be the surprise factor.

"A lot of precinct captains have had it with Percy," says Don Totten, an important Corcoran backer who headed Ronald Reagan's 1980 Illinois campaign. "The key is whether they reach out and bring ordinary

Please Turn to Page 21, Column 1



Rep. Tom Corcoran

# Humbling Fight: Despite His Prestige, Sen. Percy Is the Only GOP Senator to Face Primary Challenge

Continued From First Page

voters to Corcoran. It's an uphill fight. But if they do reach out, and if the turnout is low, then Corcoran could surprise." The Corcoran hope is that the independent voters who might normally back Sen. Percy will be attracted to the more interesting Democratic presidential primary this time, leaving the field to more conservative Republican voters.

Sen. Percy, though, is leaving little to chance. He will spend \$1.5 million or so in the primary campaign. Former President Ford campaigned for him. Sen. Percy has launched an expensive series of television ads, something he once said would be unnecessary in the primary. He is busily setting up a telephone-bank operation. And he is working tirelessly.

"I had a report this morning from Quincy," Gov. James Thompson quipped in introducing the senator recently. "A man stopped to tie his shoelaces: Chuck Percy talked to him for 20 minutes. Last week in Chicago, two elderly ladies passed while crossing the street, and Chuck Percy was there, talking about the deficit."

## Major Supporters

From "Big Jim" Thompson and House Republican Leader Robert Michel on down, a phalanx of Illinois Republicans heavyweights supports the embattled senator. Under the governor's watchful eye, the big Lincoln Day lunch at Springfield last month turned into an unofficial Percy rally. Huge buttons distributed at the door juxtaposed pictures of the senator and Abraham Lincoln, the governor introduced the senator as "an Illinois treasure," and the official program featured 19 Percy photographs.

Still, there is an air of faded glory about the Percy campaign, and about the senator himself, an air of a man who has gone as high as he is going to go. "Time and opportunity have passed him by," Mr. Totten says. "If he wins reelection, I think this will be his last term."

What he has attained—the prestigious Foreign Relations Committee chairmanship—is a lot. But recent political history hasn't been kind to the committee's chairmen. Predecessors J. William Fulbright and Frank Church both lost reelection bids. Something about the job, with its glamorous trips to foreign capitals and its preoccupation with the rarefied issues of statecraft, doesn't sit well with ordinary voters. And it is one of the ironies of Sen. Percy's life that his performance as chairman has given Tom Corcoran issues to exploit.

## Earlier Moscow Trip

"Remember when Senator Percy went to Moscow and embarrassed Ronald Reagan?" asked one early Corcoran television spot. This refers to a Percy trip, at the dawn of the Reagan presidency, in which the senator intimated to Soviet leaders that Mr. Reagan was more receptive to arms limitation than in fact he was. The spot then cuts to Rep. Corcoran, standing beside an American flag. "Congressman Tom Corcoran—an Illinois Republican America can count on."

A more controversial Corcoran spot opens with an arm-waving, guttural-voiced Jesse Jackson, the black Democratic presidential candidate, haranguing a crowd.

When push comes to shove, Jesse Jackson knows he can count on Charles Percy," the

This refers to the briefing the senator gave Mr. Jackson before the Syrian trip that freed U.S. ship Robert Goodwin. Although President Reagan publicly thanked Mr. Jackson at the White House, Rep. Corcoran nevertheless argues that Sen. Percy shouldn't have got involved in the subtle maneuver of a Democratic presidential candidate.

Sen. Percy charges the spot has "racist implications," and adds depict it as an attempt to win white ethnic voters in the Chicago area, where racial tensions were heightened by last year's election of Harold Washington, a black, as Chicago mayor. Rep. Corcoran denies the charge but acknowledges that he is focusing his campaign on Cook County, which casts roughly 36% of the vote in a typical Illinois Republican primary, and the surrounding "collar counties."

The ad referring to Jesse Jackson has drawn editorial criticism. And efforts by some Jewish contributors to defeat Sen. Percy have generated a sympathy backlash.

## Israel Issues

These contributors are angry that the senator quickly criticized Israel's invasion of Lebanon in 1982 and, over the years, has shown some sympathy for the claims of Palestinians. Morris Amitay, the former executive director of the American Israel Public Affairs Committee, is supporting Mr. Corcoran in the primary, though he would back Democratic Rep. Paul Simon in the general election. And a fund-raising letter from Louis A. Morgan, a Northfield, Ill., business executive, has portrayed Sen. Percy as "Israel's most powerful adversary" in the Senate. But in response to such tactics, former New York Sen. Jacob Javits and 58 Illinois Jewish leaders recently signed a letter defending the senator.

In the closing weeks of the campaign, Mr. Corcoran will hammer on the theme that Sen. Percy is more liberal than the average Republican voter or President Reagan. "Chuck's always been pretty good at keeping a bushel basket over his voting record," he says. In response to the Corcoran charge that he isn't a true Republican, the senator demands, "Who is he—God or someone?" In any case, the challenger's task has been complicated by Mr. Reagan himself.

The president lauded the senator as "a major American statesman and an outstanding salesman for Illinois" at a January 1983 fund-raising dinner. Rep. Corcoran, an unde-

clared candidate at the time, held his own counter-dinner in the same hotel. But Mr. Reagan didn't drop by, not even after Corcoran business stopped on the floor to get his attention. The president did declare his neutrality once Mr. Corcoran had formally entered the race, but the damage had been done. Today, the "outstanding salesman" statement is the centerpiece of a Percy television commercial.

## Ties to Reagan

In other ways, too, the senator dutifully wraps himself in the Reagan mantle. "All those who think the president did the right thing in going into Grenada, say 'Aye!' " he directs his audience, and promptly votes aye himself. "We" have stopped the spread of communism in the Caribbean. "We" have cut spending and "we" have cut taxes, he says. "Finish the job! That's why he's running, and that's why I'm running."

Trying to avoid the fate of predecessors

Fulbright and Church, Sen. Percy argues that his Foreign Relations chairmanship is more than just a ticket to champagne receptions in faraway capitals. In fact, he says, it is "the Illinois advantage." It allows him to promote Illinois exports and to bring more defense contracts out of the Pentagon.

His sights are lower now, the senator seems to say as he shuttles ceaselessly between the Chicago megalopolis and the downstate cornfields. The White House dream is behind him. And he has changed his mind about some things, including the virtues of being a senior senator.

"I can well remember the day I walked into Sen. Dirksen's office as a freshman and said, 'Ev, there's got to be a better way than this seniority system,'" he told a Springfield audience. "And Everett Dirksen said, 'Chuck, the longer you're here the more the system will grow on you.'"

"What a man of foresight and vision!"

## Dixon Ticonderoga Co.

VERO BEACH, Fla.—Dixon Ticonderoga Co. said it sold its plant properties in Jersey City, N.J., to Dixon Venture, a development partnership, for \$3 million in cash and notes.

Proceeds were used to reduce bank debt, the company said.

Dixon Ticonderoga, a pencil, art material, crayon and real-estate development concern, said that it leased back for two years one of the plants, which is used for manufacturing industrial and graphic arts graphic leads.

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Kim -

The identifiable Republicans  
 are circled - for your  
 convenience! (but no one  
 makes a move without my o.k.)

Wami

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U.S. POSTAGE  
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Permit No. 1243

Michael Goland  
P.O. Box 59072  
#807  
Chicago, IL 60659

85040511748



Sen. Charles Percy with Saudi  
Arabian Ambassador Faisal Alhegelan.

# Charles Percy— FRIEND OR FOE OF ISRAEL?

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Paid for by Michael Goland. Not authorized by any candidate or candidate's committee.

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# **SOME QUESTIONS & SOME ANSWERS ABOUT THE PERCY RECORD.**

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## **1 ■ Is Charles Percy a friend of Israel?**

Let's look at the facts—

On one hand, in his 17 years in the Senate, Percy has supported foreign aid, including aid to Israel, and has worked on behalf of Soviet and Ethiopian Jews. But, at the same time, Percy led the Senate fights for the sale of deadly F-15 fighter bombers and, later, sophisticated AWACS aircraft to Saudi Arabia; called for a Palestinian state headed by Yasser Arafat; opposed additional aid to Israel; and was the first Senator to urge the suspension of the sale of F-16s to Israel.

Which leads to a second question...

## **2 ■ Has Charles Percy changed his position on Israel in recent years?**

Yes. Until early 1975, Percy was regarded as consistently pro-Israel. But upon his return from a tour of the Middle East, he made a 180-degree switch calling Yasser Arafat a "relative moderate" and branding Israel as "intransigent." These Percy positions have continued since 1975 on a series of Middle East issues.

## **3 ■ How important was Charles Percy in the AWACS fight in Congress?**

Percy led the bitter fight to sell the ultra-sophisticated AWACS aircraft to Saudi Arabia. The night the AWACS sale was approved, Charles Percy left the Senate chamber to attend a victory celebration at the home of the Tunisian ambassador. In his book, *Arab Reach*, Hoag Levins described the scene at the Embassy.

After months of vicious debate and brutal political infighting, the Senate had cast a momentous 52-48 vote in favor of the Arabs and against Israel. And throughout the night, the halls resounded with the glee of a crowd whose members told and retold the story, and toasted and retoasted the defeat of Israel.

Some of the loudest toasts were from John Tower, Chairman of the Senate Armed Services Committee, and Charles Percy, Chairman of the Senate Foreign Relations Committee. Each had played a crucial role in undercutting the Israel lobby's campaign during the bruising months of struggle. Tower and Percy threw their arms around each other as the Arab banquet crowd cheered.

"Here was the great guy," said Percy, hefting his champagne goblet to Tower.

Tower hoisted his own goblet to Percy. "Here was our leader," he said, beaming.

4

## **What are Percy's views on Arafat and the P.L.O.?**

Percy characterizes Arafat as a "relative moderate" compared to George Habash, the mastermind of the Munich massacres. In 1980, Percy visited Moscow and met with Kremlin leaders. U.S. Embassy cablegrams revealed that Percy told the Soviet officials that he favored an Arafat-led Palestinian state because, "this would permit Arafat to realize his wish to be chief of state."

5

## **Does Charles Percy always support aid to Israel?**

No. Since becoming chairman of the Senate Foreign Relations Committee, Percy has at times opposed increases in the aid figures. Consider these examples from just 1982 when Percy:

- Pledged on "Face the Nation" to cut aid levels to Israel already approved by a majority of his own Foreign Relations Committee;
- Opposed the Boschwitz Amendment to convert \$300 million in loans to Israel to grants for Israel;
- Opposed the Cranston Amendment to add \$125 million in economic assistance to Israel;
- Voted against an amendment allowing an additional \$225 million in foreign aid to Israel.

6

## **Have Percy's Arab business dealings influenced his position on Middle East issues?**

This is a hard question to answer definitively. Percy sits on the board of Chase Manhattan Bank and other banks that have interests with the Saudis and other Arab governments. And in 1976, Percy led the fight to block disclosure of the extent of Arab countries' deposits in American banks. These two facts may or may not be related. You must decide.

7

## **Is it better to support Percy and hope he changes—or work to defeat him in 1984?**

Again, this is something for you to decide. What seems clear is that Charles Percy is not likely to change. The last time he ran for re-election, Percy was in trouble in Illinois and within the Illinois Jewish community. On the eve of the election, he admitted that he had made mistakes and promised to change. The Percy record over the last five years suggests that was an empty promise, including his recent castigation of Israeli policies to Prime Minister Shamir during his visit to Washington.

Most political observers believe that Percy is facing the most serious challenge of his political life. He faces a strong challenge in the Republican primary and, if he survives, he must face one of four Democrats—all of whom have the ability to run a strong Illinois campaign and all of whom would probably be more supportive of closer U.S.-Israel ties.

By now you have probably heard a lot about the record of Charles Percy on the State of Israel. And you may be confused because of the conflicting stories you've been told. Those who support Charles Percy's re-election to the Senate offer one description of his record while those who oppose his re-election present a quite different set of facts.

By now you may be wondering what the truth really is—where Charles Percy really stands on the issue of a close U.S.-Israel friendship.

While Percy's position on the Middle East is not the only issue confronting Illinois voters, it is certainly worthy of very close attention. For Charles Percy's influence as Chairman of the Senate Foreign Relations Committee is enormous and his actions have a tremendous effect on the quality of the U.S.-Israel relationship.

To clear up the confusion, we asked some direct and important questions about what Charles Percy has said and done in his 17 years in the Senate.

**What we found is contained  
inside—  
and it shows that while Percy  
claims he is not a foe,  
he is certainly no friend . . . .**

---

Telegram

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SECRETARY OF THE SENATE RPT DLY MGM, DLR  
 119 D ST NORTH EAST  
 WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 90,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES W PERCY. TO ACHIEVE THIS  
 I PAID \$27,639.60 TO A B DATA LTD 8050 NORTH PORT WASHINGTON ROAD  
 MILWAUKEE WISCONSIN 53217  
 MICHAEL GOLAND  
 20221 PRARIE ST  
 CHATSWORTH CA 91311

14:53 EST

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85040511752

4-0345968074 03/14/84 ICS IPMBNGZ CSP POMH  
 8183493661 TDRN CHATSWORTH CA 39 03-14  
 0316P EST 15:17 EST



Western Union

Telegram

SECRETARY OF SENATE RPT DLY MGM, DLR ASAP  
 119 D ST NE  
 WASHINGTON DC 20510

I MICHAEL GOLAND AUTHORIZED AND PAID FOR A MAILING OF 300,000 LETTERS  
 FOR THE PURPOSE OF OPPOSING SENATOR CHARLES H PERCY. TO ACHIEVE THIS  
 I PAID \$100,000 TO C. L. C. O, INC, 2525 WILSON BOULEVARD, ARLINGTON,  
 VIRGINIA 22201;  
 MICHAEL GOLAND  
 20221 PRAIRIE ST  
 CHATSWORTH CA 91311

15:17 EST

IPMPOMX WSH

I 47 4/3/84

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## Illinois Citizens for Political Integrity

P.O. Box 9534

Downers Grove, IL 60515



Dear Illinois friend:

I want a conservative U.S. Senator elected in 1984 to help Ronald Reagan. You may not know, me, I'm Robert Knabe - a Chicago Reagan supporter - and I was shocked to learn recently just how liberal Chuck Percy really is.

It may surprise you to learn the truth, but every six years Chuck Percy campaigns as a conservative to convince you that he's not a liberal. He is a liberal, he's no friend of Ronald Reagan, and he doesn't represent Illinois.

As Chairman of the Senate Foreign Relations Committee, he's the most powerful man in Congress on foreign policy. When you look at his record, you'll know we need to replace him in the U.S. Senate.

There is an alternative - a real choice for our U.S. Senator. He's Congressman Tom Corcoran, a genuine Reagan Republican.

4 Illinois State Representative Penny Pullen said in endorsing Tom Corcoran,

5 "Percy represents the failed policies of the past. Corcoran is a staunch defender of America's interests in foreign affairs and national defense."

6 Nationally syndicated columnist M. Stanton Evans said,

7 "Senator Percy is out of touch. If you simply examine his issue positions...it is very clear not only that Percy's issue positions are out of step with the stated positions of the Reagan Administration, but with majority public sentiment as well."

8 Let's look at just a few issues - and Chuck Percy's stands:

- \* Mr. Percy cast the deciding vote in the Senate against Ronald Reagan's 1984 budget - resulting in higher spending and deficits.
- \* Mr. Percy voted for the high tax bill which contained the 10% withholding tax on interest and dividends.
- \* Mr. Percy voted to give \$75 million to Marxist Nicaragua, and called for diplomatic recognition for Fidel Castro's Cuba.
- \* Mr. Percy voted to give away our Panama Canal.
- \* Mr. Percy opposes President Reagan's efforts to enact a school prayer Amendment to our Constitution.
- \* Mr. Percy opposed efforts to end forced busing to achieve racial quotas in our schools.

Mr. Percy undermines Ronald Reagan's peace efforts in the Middle East by referring to the terrorist Yassir Arafat as "moderate."

When challenged on his liberal voting record in 1978 by his Democrat opponent - who was more conservative - Mr. Percy knew he was in trouble.

He called in Ronald Reagan to ask him to save Percy's Senate seat.

This was the same Chuck Percy who in 1975 had called Ronald Reagan a man with "neither an adequate understanding of complex national and international issues," nor "the required vision" to be president.

Mr. Percy promised he'd learned his lesson - he'd mend his ways by listening to the people if they would only re-elect him Senator. He promptly forgot the promise.

To repay Ronald Reagan for his 1978 help, Chuck Percy helped Mr. Reagan's opponent for the presidency in 1980! After the Republican convention nominated Reagan for President, Mr. Percy and his wife both donated \$500 to John Anderson's independent candidacy against Reagan.

FURTHER REPAYING RONALD REAGAN, CHUCK PERCY SUPPORTED JIMMY CARTER MORE THAN HE HAS RONALD REAGAN AS PRESIDENT.

Unfortunately for Mr. Percy, Illinois voters have a longer memory than he does. Another Illinois president - Abraham Lincoln - wrote,

"You can fool some of the people some of the time,  
but you can't fool all of the people all of the time."

Those who believed Chuck Percy's 1978 promise to reform were fooled. They didn't appreciate it - not a bit!

They won't be fooled again. Chuck Percy will never again win their votes. He can't win without them. If nominated, he'll lose in November.

So, Illinois Republicans have a choice We can nominate Chuck Percy - a sure loser in November - OR WE CAN NOMINATE CONGRESSMAN TOM CORCORAN - A MAN WHO WILL WIN THE NOVEMBER ELECTION!

Of course, Illinois Republicans want more than just a Senator.

WE WANT A SENATOR WHO VOTES IN WASHINGTON LIKE HE TALKS IN ILLINOIS!

WE WANT A SENATOR WHO WILL BE LOYAL IN SUPPORTING RONALD REAGAN!

WE WANT A SENATOR WHO SUPPORTS LOWER TAXES, LOWER FEDERAL SPENDING AND OPPORTUNITY FOR US, OUR CHILDREN AND OUR GRANDCHILDREN.

WE WANT TOM CORCORAN!

Few Congressmen have made more impact on important legislation in Washington than this 44-year-old, four-term Representative.

A native of Ottawa, Illinois, Tom Corcoran graduated from Notre Dame University, served as an officer in the U.S. Army, became a successful businessman and is the father of five children.

Tom Corcoran is not a career politician. He was Vice-President of the Chicago and North Western Railroad when he decided he should be helping make America great again as a citizen-legislator.

Tom Corcoran defeated a liberal Democrat in 1976 to win his seat

more...

in Congress, but he's been far more than a seat warmed in the House.

Since his election, Tom Corcoran voted just like he promised to vote. He has a solidly conservative, pro-defense, pro-energy, pro-family and pro-America voting record which has re-elected him with large margins.

Tom Corcoran has earned his pay - even though he voted against raising it. MULTI-MILLIONAIRE CHUCK PERCY VOTED TO RAISE HIS OWN PAY!

Tom Corcoran serves on the important Energy and Commerce Committee where he is credited with stopping the legislation which would have greatly increased natural gas prices without adding to gas supplies.

His pro-energy achievements are helping us to have the energy we need to heat our homes, fuel our cars and keep our jobs, but he's done much, much more for us and this nation.

HE WAS ONE OF THE MOST EFFECTIVE ADVOCATES OF THE REAGAN TAX CUTS WHICH REDUCED YOUR PERSONAL INCOME TAXES BY 25% OVER THE LAST 3 YEARS.

TOM CORCORAN CONSISTENTLY SUPPORTS LIMITING THE GROWTH OF FEDERAL SPENDING TO TRY TO BALANCE THE FEDERAL BUDGET.

CONGRESSMAN CORCORAN SUPPORTS THE CONSTITUTIONAL AMENDMENT TO BALANCE THE BUDGET. HE'S FED UP WITH \$200 BILLION DEFICITS EACH YEAR.

When liberals like Chuck Percy voted higher taxes in 1982 with the promise of lowering spending by \$300 billion, Tom Corcoran voted "NO!"

He knew there would be no spending cuts, only tax hikes. He was right. TOM CORCORAN AGREES WITH PRESIDENT REAGAN'S STATEMENT,

"PEOPLE AREN'T TAXED TOO LITTLE - GOVERNMENT SPENDS TOO MUCH."

Instead of cutting spending and deficits as Percy promised, the 1982 deficit of \$110 billion grew to \$194 billion in 1983. Clearly the big taxing Chuck Percy doesn't represent you. Tom Corcoran does.

Chuck Percy claims to be a Republican - but you be the judge!

Mr. Percy voted with the Republican Party 42.8% of the time.

Mr. Corcoran voted with the Republican Party 83.8% of the time.

Who best represents you in Washington - Chuck Percy or Tom Corcoran?

If you want to elect as your Senator a solid, proven, loyal Reagan conservative with the integrity you admire in political office, Tom Corcoran is your choice.

If you want a respected Republican - a firm supporter of President Reagan - a Senator who will help stop the massive national disgrace in deficit spending by the liberals, Tom Corcoran is your man.

The Republican primary in Illinois is on Tuesday, March 20, 1984.

more...

Page 4:

That's not far away, so mark March 20th on your calendar.

TOM CORCORAN NEEDS YOU. HE NEEDS YOUR VOTE. HE REALLY DOES!

You see, Chuck Percy has a massive warchest he's using to try to fool the voters of Illinois again into thinking he's really a conservative. He's trying to make the people think he supports Ronald Reagan - again.

Tom Corcoran - the real Reagan supporter in Congress - has limited funds for his campaign. He has run a campaign of the people, and that means that only with the help of men and women like you all across the state of Illinois - taking the time and effort to vote - can he win.

So, please complete the TOM CORCORAN SUPPORT FORM right now, and return it to me today in the return envelope I've also enclosed for your easy use. I'm not asking you to donate, just to support Tom with your vote and help in getting friends, neighbors and relatives to vote for Tom as well.

Here's what YOU CAN DO - TODAY!

1. Complete and return the enclosed TOM CORCORAN SUPPORT FORM.
2. TELL YOUR FRIENDS AND OTHERS ABOUT TOM. GET THEM TO THE POLLS ON ELECTION DAY - TUESDAY, MARCH 20, 1984.
3. Volunteer to help TOM CORCORAN be elected U.S. Senator.

Please don't allow this day to end without completing and returning your TOM CORCORAN SUPPORT FORM in the enclosed return envelope.

Remember, your effort today will help America's tomorrows to be blessed with freedom, economic prosperity and integrity in political office.

Thank you for your concern - and your efforts. With deep appreciation, I remain

Most sincerely yours,

  
Robert Knabe

P.S. We worked hard to nominate Ronald Reagan in 1976 and to elect him in 1980. Now we must work to re-elect him - and to send him a U.S. Senator who will support his policies. That means Congressman Tom Corcoran, a loyal Reagan supporter. The winning ticket for 1984 is REAGAN-CORCORAN!

P.P.S. Don't forget - primary election day is Tuesday, March 20, 1984.

## Tom Corcoran Support Form

Dear Robert:

I agree with you that our U.S. Senator must be a man of integrity, one on whom we can rely to vote the same way in Washington, D.C. as he says he will in Illinois.

I know that Chuck Percy promised to listen to the people in 1978, only to forget us when he returned to his comfortable Senate seat.

I want the Republican Party to control the U.S. Senate, and I understand that Illinois voters aren't going to be fooled by Percy again. I want to nominate a conservative who can be elected in November and who can help President Reagan win the election.

Tom Corcoran is the type of conservative leader Republicans can rely on to be consistent. He's a man of genuine integrity.

☐ I'll vote for Tom Corcoran on primary election day - Tuesday, March 20, 1984.

☐ I'll tell my friends, neighbors and family members about Tom's campaign - and help them to get out to vote on primary day.

☐ I'll volunteer to help Tom Corcoran's campaign for the U.S. Senate. Please contact me at the address (or phone number) below.

☐ I've listed the names and addresses of others I think will help Tom Corcoran win the U.S. Senate seat this year.

Please Print.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Federal Election Commission regulations require that we ask the following information.

Occupation: \_\_\_\_\_

Business firm: \_\_\_\_\_

★ ICPI, P.O. Box 9534, Downers Grove, IL 60515 ★

*Paid for by Michael Goland, and not authorized by any candidate or candidate's committee.*

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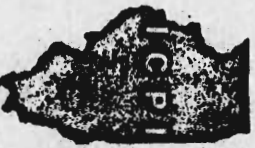
FROM: \_\_\_\_\_

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PLACE  
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Illinois Citizens for Political Integrity

P.O. Box 9534  
Downer s Grove IL 60515



Illinois Citizens for Political Integrity  
P.O. Box 9534  
Downer s Grove IL 60515

*Handwritten:*  
The  
Bible  
is  
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of  
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US POSTAGE  
PAID  
Permit #3402  
CHICAGO, IL

BULK RATE

PLEASE OPEN  
IMMEDIATELY!  
ILLINOIS IS  
COUNTING ON YOU!

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# ITEMIZED DISBURSEMENTS

LINE NUMBER 37  
(Use separate schedule(s) for each category of the Detailed Summary Page)

Items for each Detailed Page

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

Committee (In Full)

## FOR SENATE COMMITTEE

|  |   |                                    |  |
|--|---|------------------------------------|--|
| Name, Mailing Address and ZIP Code<br>DREA<br>P.O. Box 1000<br>Fort Washington Rd.<br>Waukegan, WI 53217 | Purpose of Disbursement<br>Campaign Mailing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):        | Date (month, day, year)<br>4-23-83 | Amount of Each Disbursement This Period<br>\$2,000.00  |
| Name, Mailing Address and ZIP Code<br>Special Services, Inc.<br>Victoria Dr.<br>Springfield, IL 62704    | Purpose of Disbursement<br>Campaign Consultant Fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month, day, year)<br>5-4-83  | Amount of Each Disbursement This Period<br>\$1,000.00  |
| Name, Mailing Address and ZIP Code<br>Burk<br>W. Downer Pl.<br>Chicago, IL 60506                         | Purpose of Disbursement<br>Campaign Consultant Fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month, day, year)<br>5-5-83  | Amount of Each Disbursement This Period<br>\$400.00    |
| Name, Mailing Address and ZIP Code<br>Gates<br>N. Farnsworth Ave.<br>Chicago, IL 60505                   | Purpose of Disbursement<br>Campaign Office Rent<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):    | Date (month, day, year)<br>5-17-83 | Amount of Each Disbursement This Period<br>\$300.00    |
| Name, Mailing Address and ZIP Code<br>Finkelstein & Assoc.<br>1111 N. Dearborn Ave.<br>Chicago, NY 10549 | Purpose of Disbursement<br>Campaign Voter Survey<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Date (month, day, year)<br>5-20-83 | Amount of Each Disbursement This Period<br>\$14,000.00 |
| Name, Mailing Address and ZIP Code<br>Finkelstein & Assoc.<br>1111 N. Dearborn Ave.<br>Chicago, NY 10549 | Purpose of Disbursement<br>Campaign Voter Survey<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Date (month, day, year)<br>5-31-83 | Amount of Each Disbursement This Period<br>\$14,000.00 |
| Name, Mailing Address and ZIP Code<br>Press<br>P.O. Box 1000<br>Chicago, IL 61350                        | Purpose of Disbursement<br>Campaign Printing<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):       | Date (month, day, year)<br>6-6-83  | Amount of Each Disbursement This Period<br>\$500.00    |
| Name, Mailing Address and ZIP Code<br>Burk<br>W. Downer Pl.<br>Chicago, IL 60506                         | Purpose of Disbursement<br>Campaign Consultant Fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month, day, year)<br>6-8-83  | Amount of Each Disbursement This Period<br>\$400.00    |
| Name, Mailing Address and ZIP Code<br>Postmaster<br>Chicago, IL 60507                                    | Purpose of Disbursement<br>Campaign Postage<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):        | Date (month, day, year)<br>6-8-83  | Amount of Each Disbursement This Period<br>\$670.00    |
| Total of Disbursements This Page (optional) .....  |   |                                    | \$33,270.00  |
| Period (last page this line number only) .....   |   |                                    |  |

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**CORCORAN FOR SENATE COMMITTEE**

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|--|--|--|---|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br><b>Sigma Press</b><br><b>Rt. 23 &amp; I-80</b><br><b>Ottawa, IL 61350</b>                   | <b>Purpose of Disbursement</b><br><b>Campaign Printing</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br><b>6-27-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$949.38</b>   |
| <b>B. Full Name, Mailing Address and ZIP Code</b><br><b>Wolf C. Dietrich</b><br><b>6819 Harvest Ave.</b><br><b>Woodridge, IL 60517</b>           | <b>Purpose of Disbursement</b><br><b>Reimbursement for travel expense</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$238.49</b>   |
| <b>C. Full Name, Mailing Address and ZIP Code</b><br><b>Illinois Bell</b><br><b>225 W. Randolph</b><br><b>Chicago, IL 60606</b>                  | <b>Purpose of Disbursement</b><br><b>Campaign Phone</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                   | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$700.91</b>   |
| <b>D. Full Name, Mailing Address and ZIP Code</b><br><b>Pitstick's Pavillion</b><br><b>Route 2</b><br><b>Ottawa, IL 61350</b>                    | <b>Purpose of Disbursement</b><br><b>Fundraiser Dinner</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$437.33</b>   |
| <b>E. Full Name, Mailing Address and ZIP Code</b><br><b>River St. Press</b><br><b>149 S. River</b><br><b>Aurora, IL 60506</b>                    | <b>Purpose of Disbursement</b><br><b>Campaign Printing</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$543.34</b>   |
| <b>F. Full Name, Mailing Address and ZIP Code</b><br><b>Advertising Specialities, Inc</b><br><b>331 E. Superior</b><br><b>Ottawa, IL 61350</b>   | <b>Purpose of Disbursement</b><br><b>Campaign Paraphernalia</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$312.97</b>   |
| <b>G. Full Name, Mailing Address and ZIP Code</b><br><b>U.S. Postmaster</b><br><b>Aurora, IL 60507</b>   | <b>Purpose of Disbursement</b><br><b>Campaign Postage</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$500.00</b>   |
| <b>H. Full Name, Mailing Address and ZIP Code</b><br><b>Cedric Spring &amp; Assoc.</b><br><b>113 E. Main St.</b><br><b>St. Charles, IL 60174</b> | <b>Purpose of Disbursement</b><br><b>Campaign Paraphernalia</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):           | <b>Date (month, day, year)</b><br><b>6-30-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$419.10</b>   |
| <b>I. Full Name, Mailing Address and ZIP Code</b><br><b>A. B. DATA</b><br><b>8050 N. Port Washington Rd.</b><br><b>Milwaukee, WI 53217</b>       | <b>Purpose of Disbursement</b><br><b>Campaign Mailing</b><br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 | <b>Date (month, day, year)</b><br><b>6-17-83</b> | <b>Amount of Each Disbursement This Period</b><br><b>\$2,000.00</b> |
| <b>SUBTOTAL of Disbursements This Page (optional)</b>  |  |  | <b>\$6,101.52</b>   |
| <b>TOTAL This Period (last page this line number only)</b>   |  |  |   |

ITEMIZED DISBURSEMENTS

Page 2 of 41 for  
 NUMBER 17  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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

Committee (in Full)

MAN FOR SENATE COMMITTEE

|   |   |                                       |   |
|---|---|---------------------------------------|---|
| Name, Mailing Address and ZIP Code<br>Data<br>J. Port Washington<br>Lake, WI 53217                | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-16-83 | Amount of Each<br>Disbursement This Period<br>\$6,000.00  |
| Name, Mailing Address and ZIP Code<br>Data<br>J. Port Washington<br>Lake, WI 53217                | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$12,000.00 |
| Name, Mailing Address and ZIP Code<br>Data<br>J. Port Washington<br>Lake, WI 53217                | Purpose of Disbursement<br>mailing service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):     | Date (month,<br>day, year)<br>7-20-83 | Amount of Each<br>Disbursement This Period<br>\$646.72    |
| Name, Mailing Address and ZIP Code<br>Data<br>Holtman<br>Madena Dr.<br>Mery, IL 60538             | Purpose of Disbursement<br>Aurora Office rent<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):  | Date (month,<br>day, year)<br>7-21-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |
| Name, Mailing Address and ZIP Code<br>Data<br>ois Bell<br>e. Randolph<br>go, IL 60606             | Purpose of Disbursement<br>WATS service<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):        | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$240.61    |
| Name, Mailing Address and ZIP Code<br>Data<br>ois Bell<br>e. Randolph<br>go, IL 60606             | Purpose of Disbursement<br>Aurora Office phone<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,522.94  |
| Name, Mailing Address and ZIP Code<br>Data<br>Dietrich<br>Harvest Ave.<br>idge, IL 60517          | Purpose of Disbursement<br>consultant fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$1,875.00  |
| Name, Mailing Address and ZIP Code<br>Data<br>y Computer Center<br>Lincolnway<br>Aurora, IL 60542 | Purpose of Disbursement<br>computer supplies<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):   | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$346.48    |
| Name, Mailing Address and ZIP Code<br>Data<br>Bakala<br>ans Souci Dr.<br>a, IL 60506              | Purpose of Disbursement<br>consultant fee<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):      | Date (month,<br>day, year)<br>9-24-83 | Amount of Each<br>Disbursement This Period<br>\$300.00    |
| TOTAL of Disbursements This Page (optional) .....   |   |                                       | \$23,231.75   |
| This Period (last page this line number only) .....   |   |                                       |   |

## EXHIBIT 11

| Name of Committee (in Full)   |  | Outstanding<br>Balance Beginning<br>This Period | Amount<br>Incurred<br>This Period | Payment<br>This<br>Period | Outstanding<br>Balance at Close<br>of This Period |
|---|--|---|-----------------------------------|---------------------------|---|
| <b>Corcoran for Senate Committee</b>  |  |   |                                   |                           |   |
| <b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>Savin Corporation<br>1400 E. Higgins Rd.<br>Elk Grove Village, IL 60007  |  | 400.00  | 1,012.46                          | -0-                       | 1,412.46  |
| <b>Nature of Debt (Purpose):</b><br>Copier rent & supplies  |  |   |                                   |                           |   |
| <b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>SPRINT Communications Corp.<br>P. O. Box 974<br>Burlingame, CA 94010     |  | 500.00  | 1,424.22                          | 970.86                    | 953.36  |
| <b>Nature of Debt (Purpose):</b><br>Des Plaines office phone  |  |   |                                   |                           |   |
| <b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>United Envelope Corp.<br>1200 S. Sterling Blvd. #A<br>Sterling, VA 22170 |  | -0-   | 1,531.45                          | -0-                       | 1,531.45  |
| <b>Nature of Debt (Purpose):</b><br>Printing  |  |   |                                   |                           |   |
| <b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>The Viguerie Company<br>7777 Leesburg Pike<br>Falls Church, VA 22043     |  | -0-   | 3,609.58                          | 2,000.00                  | 1,609.58  |
| <b>Nature of Debt (Purpose):</b><br>Mailing service   |  |   |                                   |                           |   |
| <b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>United Air Lines<br>P. O. Box 66100<br>Chicago, IL 60666                 |  | 11,079.97                                       | -0-                               | -0-                       | 11,079.97   |
| <b>Nature of Debt (Purpose):</b><br>Airplane travel   |  |   |                                   |                           |   |
| <b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b><br>A. B. Data, Inc.<br>8050 N. Port Washington Rd.<br>Milwaukee, WI 53217   |  | 10,000.00                                       | 53,800.00                         | 23,800.00                 | 40,000.00   |
| <b>Nature of Debt (Purpose):</b><br>Mailing service   |  |   |                                   |                           |   |
| <b>1) SUBTOTALS This Period This Page (optional)</b>  |  |   |                                   |                           | <b>\$56,586.82</b>                                |
| <b>2) TOTAL This Period (last page this line only)</b>  |  |   |                                   |                           |   |
| <b>3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)</b>  |  |   |                                   |                           |   |
| <b>4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)</b>  |  |   |                                   |                           |   |

4—Section 1 Thursday, July 7, 1983 THE DAILY HERALD

# Corcoran calls Percy Israel's foe

WASHINGTON (AP) — Illinois Sen. Charles H. Percy is under attack as Israel's most powerful adversary in the Senate in an expanded replay of a political fund-raising drive that figured heavily in the defeat of Downstate Rep. Paul Findley last year.

"More than any other officeholder in Washington, Percy has worked to destroy the special relationship between the United States and Israel," says a letter sent to more than 50,000 Jewish campaign contributors nationwide on behalf of the senator's primary challenger, Rep. Tom Corcoran, R-IL.

It resembles fund-raising appeals that amassed thousands of dollars for U.S. Rep. Dick Durbin, D-IL, who unseated Findley in 1982 after the GOP lawmaker's Mideast views angered Jewish contributors.

"THEY'RE REALLY SHARPENING the knives," Findley, now a Washington writer and lecturer, said after hearing of the attack on the Senate



Charles  
Percy



Tom  
Corcoran

Foreign Relations Committee chairman. "I hate to see Chuck Percy on the receiving end."

Corcoran's press secretary Scott McMurray said the 50,000 fund-raising packets fashioned by direct mail expert Jerry Benjamin of Milwaukee, a Durbin consultant in 1982, were mailed

June 15 and have "unmet expectations."

"You can tell by the fact that we're mailing more of them that we're making money," McMurray said of the letter signed by Northfield, Ill., businessman Louis A. Morgan, a leading Durbin fund-raiser who is now heading

Corcoran's drive in the Jewish community.

The two groups are at odds over specifics in the letter.

It says Percy "led the battle" in 1979 for Senate approval of a sale of F-15 fighters to Saudi Arabia and "followed up on that sale" in 1981 when he "pushed through" Senate ratification of AWACS radar planes to the Saudis.

PERCY BACKED BOTH plans, but Foreign Relations Committee staff director Scott Cohen, a Percy supporter, argues that "led the battle" goes too far, and President Reagan "pushed through" the AWACS sale.

The letter says Percy "almost singlehandedly" blocked a shipment of F-16 fighters to Israel last year. In fact, the Reagan Administration blocked the shipment when Israel went into Lebanon but has since released the planes, in both cases with Percy's support.

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FEDERAL ELECTION COMMISSION

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THIS IS THE BEGINNING OF MUR # 1684

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